Missouri Department of Natural Resources
Air Pollution Control Program

INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: **OP2012-006A**
Expiration Date: **February 06, 2017**
Installation ID: **510-1642**
Project Number: **2012-05-087**

Installation Name and Address
Alberici Constructors, Inc.
DBA Hillsdale Fabricators, Inc.
2150 Kienlen Avenue
St. Louis, MO 63121-5505
City of St. Louis County

Parent Company's Name and Address
Alberici Constructors
8800 Page Avenue
St. Louis, MO 63114

Installation Description:
Alberici Constructors, Inc. dba Hillsdale Fabricators fabricates structural steel for power plants, bridges, airports, stadiums, arenas, casinos and many other types of structures.

The installation has the potential to be a major source of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). The installation has accepted voluntary, federally enforceable emission limitations limiting volatile organic compound (VOC) emissions to less than major source levels to qualify for this permit. As requested by the installation, this amendment incorporates federally enforceable emission limitations which limit hazardous air pollutant (HAP) emissions to below the major source threshold levels. This amendment also clarifies the applicability of 10 CSR 10-5.330 and 10 CSR 10-5.455 with respect to certain emissions units within the installation. Please note this amendment does not alter or change the expiration date of the permit, which remains February 6, 2017.

NOV 28 2012
Effective Date

Kyra L Moore
Director or Designee
Department of Natural Resources

Missouri Department of Natural Resources
Air Pollution Control Program

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Director or Designee
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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Alberici Constructors, Inc. dba Hillsdale Fabricators fabricates structural steel for power plants, bridges, airports, stadiums, arenas, casinos and many other types of structures. Hillsdale Fabricators also fabricates complex pipe structures and perform custom plate fabrication for carbon steel ductwork, selective catalytic reduction (SCR) systems, scrubbers, precipitators, absorbers, silos, baghouses, bins, miter gates, sector gates, and other types of closure structure gates. The fabrication, welding, shot blasting and coatings are performed in an enclosed building. The building is equiped with exhaust fans that remove fumes from the building.

The installation has the potential to be a major source of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs). The installation has accepted voluntary, federally enforceable emission limitations limiting volatile organic compound (VOC) emissions to less than major source levels to qualify for this permit. As requested by the installation, this amendment incorporates federally enforceable emission limitations which limit hazardous air pollutant (HAP) emissions to below the major source threshold levels. This amendment also clarifies the applicability of 10 CSR 10-5.330 and 10 CSR 10-5.455 with respect to certain emissions units within the installation. Please note this amendment does not alter or change the expiration date of the permit, which remains February 6, 2017.

The actual emissions for the past five years for the installation are listed below:

Reported Air Pollutant Emissions, tons per year					
Pollutants	2011	2010	2009	2008	2007
Particulate Matter $\leq$ Ten Microns (PM_{10})	1.61	0.95	0.95	0.59	0.00
Volatile Organic Compounds (VOC)	6.06	13.88	13.88	24.79	37.46
Hazardous Air Pollutants (HAPs)	3.23	—	—	—	—

Alberici Constructors, Inc. received a renewed Intermediate Operating Permit (OP2012-006) on February 7, 2012. The installation requested amendments to the Intermediate Operating Permit OP2012-006 to include HAPs emissions limitations and removing permit condition EU0040-001, the requirements of 10 CSR 10-5.330, associated with EP15.

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.

Emission Unit #	Description of Emission Unit
EU5A	Small Shot Blaster
EU5B	Large Shot Blaster
EU7	Spray Painting
EU10	Parts Washer
EU18	6,000 Gallon Underground Gasoline Storage Tank with Gasoline Dispensers

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.

EIQ Reference #	Description of Emission Unit
EP4	Miscellaneous Welding
EP6	Paint Shop Solvent Cleanup
EP9	Miscellaneous Space Heaters (less than 2 MMBtu/hr natural gas/propane – fired)
EP11	Equipment Maintenance and Repair Solvent Cleanup
EP15	Equipment Paint Booth
EP26	Vehicle Paint Shop Solvent Cleanup
EP28	Boiler Room and Paint Shop Solvent Cleanup

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.

Permit Condition PW001

10 CSR 10-6.065 Operating Permits
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:
The permittee shall emit into the atmosphere less than 100 tons of Volatile Organic Compounds (VOCs) from the entire installation in any consecutive 12-month period.

Monitoring/Recordkeeping:
The permittee shall maintain an accurate record of emissions of VOCs emitted into the atmosphere from this installation. The permittee shall record the monthly and running 12-month totals of the VOC emissions from this installation. Example form is attached as Attachment A (Plant-wide Emissions Tracking Record). The permittee may use this form, or forms of its own, so long as the forms used will accurately demonstrate compliance with the VOC emission limitation (less than 100 tons in any consecutive 12-month period of VOCs).

Reporting:
The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen days after any deviation from or exceedance of any of the terms imposed by this permit condition, or any malfunction which causes a deviation from or exceedance of this permit condition.

Permit Condition PW002

10 CSR 10-6.065 Operating Permits
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:
1) The permittee shall emit less than 10 tons of any individual HAP in any consecutive 12-month period; and
2) The permittee shall emit less than 25 tons of any combination of HAPs in any consecutive 12-month period.

Monitoring/Recordkeeping:
The permittee shall maintain an accurate record of emissions of HAPs emitted into the atmosphere from this installation. Example forms are attached as Attachment J and K. The permittee may use these forms, or forms of its own, so long as the forms used will accurately demonstrate compliance with the HAPs emission limitation (less than 10 tons in any consecutive 12-month period of any individual HAP or less than 25 tons in any consecutive 12- month period of any combination of HAPs).

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen days after any deviation from or exceedance of any of the terms imposed by this permit condition, or any malfunction which causes a deviation from or exceedance of this permit condition.

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.

EU5A and EU5B– Shot Blasters		
Emission Unit	Description	2011 EIQ Reference #
EU5A	Small Blaster – Wheelabrator shot blaster with baghouse (23.625 tons of shot per hour)	EP5A
EU5B	Large Blaster – Wheelabrator shot blaster with baghouse (37.125 tons of shot per hour)	EP5B

Permit Condition EU5A-001 and EU5B-001

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

1) The permittee shall not emit particulate matter in excess of:
   a) 34.11 lb/hr from EU5A; and
   b) 41.85 lb/hr from EU5B.
2) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.
3) The permittee shall not cause or permit emissions to be discharged into the atmosphere from any source in the St. Louis metropolitan area any visible emissions with an opacity greater than 20 percent.
   a) Exception:
      i) Existing sources in the St. Louis metropolitan area that are not incinerators and emit less than twenty-five (25) pounds per hour (lbs/hr) of particulate matter shall be limited to 40 percent opacity.
      ii) The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 40 percent.

Monitoring:

1) The permittee shall conduct visual monitoring of the fabric filter discharge point(s) (outlets) for any visible emissions (VE) according to the following schedule:
   a) The permittee must perform a visual determination of emissions once per day, on each day the process is in operation, during blasting operations.
   b) If no VE are detected in consecutive daily visual monitoring performed for 30 consecutive days or more of operation of the process, you may decrease the frequency of visual monitoring to once per calendar week of time the process is in operation, during blasting operations. If VE are

detected during these inspections, you must resume daily visual monitoring of that operation during each day that the process is in operation, until you satisfy the no VE criteria to resume conducting weekly visual monitoring.

2) If the visual monitoring reveals the presence of any VE, this would be an excursion and you must initiate procedures to determine the cause of the emissions within one (1) hour of the initial observation and alleviate the cause of the excursion within three (3) hours of initial observation by taking whatever corrective action(s) are necessary. A corrective action may include an investigation of the reason for the excursion, evaluation of the situation and necessary follow-up action to return the operation within the indicator range (no visible emissions). An excursion does not necessarily indicate a violation of an applicable requirement. However, when the level of excursions exceeds Three percent (3%) of the total visible emissions observations in a six (6)-month period and the corrective measures fail to return the indicator to the appropriate range; the permittee shall conduct source testing within 90 days of the excursion to demonstrate compliance with 10 CSR 10-6.400. If the test demonstrates compliance with emission limits then new indicator ranges must be set for monitoring and the new ranges must be incorporated in the operating permit. If the test demonstrates noncompliance with emission limits, then the installation, within 60 days, proposes a schedule to implement corrective action to bring the source into compliance and demonstrate compliance.

Recordkeeping:

The permittee shall maintain records of all observations. At a minimum the following observation conditions shall be noted:

1) The date and time of the observation and the weather condition;
2) Observations of visible emissions from the emission unit. Note: The absence of visible emission may be reported in a statement such as "No visible emissions were observed from this emission unit;" and
3) The corrective actions taken during excursions. Maintenance and inspection records shall also be maintained for the control devices on these emission units. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

Attachment B contains a log including these recordkeeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of 10 CSR 10 -6.400 or any occurrence of an excursion demonstrated by the appropriate recordkeeping forms.

EU7 – Painting Operation		
Emission Unit	Description	2011 EIQ Reference #
EU7	Spray Painting with dry filters for particulate control – Spray painting of structural steel.	EP7

Permit Condition EU7-001

10 CSR 10-5.330
Control of Emissions From Industrial Surface Coating Operations

Emission Limitation:

On or after March 1, 2012, no owner or operator of a surface coating unit may cause, allow, or permit the discharge into the ambient air of any VOCs from the surface coating operations of metal parts in excess of the following, as delivered to the coating applicator(s):
[10 CSR 10-5.330(3)(J)2.B.]

Metal Parts and Products Coatings	
	Emission Limit lb VOC/gallon of coating (minus water and exempt compounds)
Category	Air Dried
Prefabricated Architectural	3.5

Method and Determination of Compliance:

The emission limits shall be achieved through the following method: Determine the daily volume-weighted average VOC content of all coatings used in a surface coating unit, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds), per 10 CSR 10-5.330(5)(C)3.A. of this rule. The surface coating unit is in compliance if this value is less than or equal to the emission limits.

1) The daily volume-weighted average VOC content of all coatings used in a surface coating unit, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds), shall be calculated using the following equation:

$$DAVG_{VW} = \frac{\sum_{i=1}^{n}(A_i \times B_i)}{C}$$

Where:
$DAVG_{VW}$ = daily volume-weighted average VOC content, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds);
A = daily gallons of each coating used (minus water and exempt compounds) in a surface coating unit;
C = total daily gallons of coatings used (minus water and exempt compounds) in a surface coating unit;
n = number of coatings used in a surface coating unit; and
B = VOC content of the coating as applied, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds).

2) VOC content of the coating as applied (B), expressed as pounds of VOC per gallon of coating (minus water and exempt compounds). This is determined using the following equation per Subparagraph (5)(C)1.A. of 10 CSR 10-5.330.

$$B = \frac{D_c \times W_o}{1 - \left(\frac{D_c \times W_w}{8.33}\right) - \left(\sum_{j=1}^{m} \frac{D_c \times W_{Ej}}{D_{Ej}}\right)}$$

Where:
D_C = density of coating as applied, expressed as pounds per gallon;
W_O = weight fraction of regulated VOC in the coating, as applied. This value does not include the weight fraction of water or exempt compounds;
W_W = weight fraction of water in the coating, as applied;
W_E = weight fraction of exempt compounds in the coating, as applied;
D_E = density of each exempt compound, expressed as pounds per gallon;
m = number of exempt compounds in the coating; and
8.33 = density of water, expressed as pounds per gallon.

Equipment Specification:

1) Application Equipment. On or after March 1, 2012, one (1) or a combination of the following equipment shall be used for coating application, unless achieving compliance by using an add-on control device per Subparagraph (3)(J)3.C. of 10 CSR 10-5.330:
   a) Electrostatic equipment;
   b) High-volume low-pressure (HVLP) spray equipment;
   c) Flow coating;
   d) Roller coating;
   e) Dip coating, including electrodeposition;
   f) Airless spray;
   g) Air-assisted airless spray;
   h) Ink jet technology; and
   i) Other coating application method capable of achieving a transfer efficiency equivalent or better than achieved by HVLP spraying.
2) For metal parts coatings, the application equipment requirements listed above do not apply to the following types of coatings and coating operations:
   a) Touch-up coatings;
   b) Repair coatings; and
   c) Textured coatings.

Work Practices:

On or after March 1, 2012, work practices shall be used to minimize VOC emissions from solvent storage, mixing operations, and handling operations for coatings, thinners, cleaning materials, and waste materials. Work practices shall include, but not be limited to, the following:

1) Store all VOC-containing coatings, thinners, and cleaning materials in closed containers;
2) Ensure that mixing and storage containers used for VOC-containing coatings, thinners, coating related waste, and cleaning materials are kept closed at all times except when depositing or removing these materials;
3) Minimize spills of VOC-containing coatings, thinners, and cleaning materials;

4) Clean up spills immediately;
5) Convey any coatings, thinners, and cleaning materials in closed containers or pipes from one (1) location to another; and
6) Minimize VOC emissions from the cleaning of application, storage, mixing, and conveying equipment by ensuring that equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers.

Recordkeeping:

1) The owner or operator of a surface coating unit covered under this rule shall keep records as necessary to determine compliance. Records kept should be appropriate for the facility, their products, and operations. These may include, as applicable, one (1) or more of the following:
   a) Current list of coatings used and the VOC content as applied;
   b) Daily volume usage of each coating;
   c) Records of the weighted average VOC content for each coating type included in averaging for coating operations that achieve compliance through coating VOC content;
   d) Annual VOC emissions from surface coating equipment cleaning; and
   e) All test results to determine coating properties.
2) Records such as daily production rates may be substituted for actual daily coating use measurements provided the owner submits a demonstration, approved by the Director, that these records are adequate for the purposes of this rule.
3) The permittee may use Attachments C and D, or equivalent forms of its own, so long as the forms used will accurately demonstrate compliance with the recordkeeping requirements.

Reporting:

The permittee shall provide a written report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than twenty (20) days after the permittee determined that the emission unit exceeded the emission limitation.

EU10 – Parts Washer		
Emission Unit	Description	2011 EIQ Reference #
EU10	Safety Kleen Parts Washer – 30 gallon capacity	EP10

Permit Condition EU10-001

10 CSR 10-5.300
Control of Emissions from Solvent Cleaning

Emission Limitation:

1) The permittee shall not use cold cleaning solvent with a vapor pressure greater than 1.0 millimeters of Mercury (mmHg) (0.019 psi) at 20 degrees Celsius (20°C) (68 degrees Fahrenheit (68°F)).
2) Exception: The permittee may use an alternative method for reducing cold cleaning emissions if the level of emission control is equivalent to or greater than the requirements listed above. The Director and the U.S Environmental Protection Agency (EPA) must approve the alternative method.

Operational Limitation/Equipment Specification:

1) Each cold cleaner shall have a cover which will prevent the escape of solvent vapors from the solvent bath while in the closed position, or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner.
2) When one or more of the following conditions exist, the cover shall be designed to operate easily such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems):
   a) The solvent vapor pressure is greater than 0.3 psi measured at 37.8 degrees Celsius (37.8°C) (100 degrees Fahrenheit (100°F));
   b) The solvent is agitated; or
   c) The solvent is heated.
3) Each cold cleaner shall have an internal drainage facility so that parts are enclosed under the cover while draining.
4) If an internal drainage facility cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at 37.8°C (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
5) Solvent sprays, if used, shall be a solid fluid stream (not a fine, atomized or shower-type spray) and at a pressure which does not cause splashing above or beyond the freeboard.
6) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment.
7) Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at 37.8°C (100°F) or is heated above 48.9°C (120°F), must use one of the following control devices:
   a) A freeboard ratio of at least 0.75;
   b) Water cover (solvent must be insoluble in and heavier than water); or
   c) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to 65 percent. These control systems must receive approval from the Director and EPA prior to their use.
8) Each cold cleaner shall be operated as follows:

a) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent must drain into an enclosed reservoir except when performing maintenance or collecting solvent samples.
b) Cleaned parts shall be drained in the freeboard area for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining, the parts shall be positioned so that the solvent drains directly back to the cold cleaner.
c) Whenever a cold cleaner fails to perform within the rule operating requirements, the unit shall be shut down immediately and shall remain shut down until operation is restored to meet the rule operating requirements.
d) Solvent leaks shall be repaired immediately or the cleaner shall be shut down until the leaks are repaired.
e) Any waste material removed from a cold cleaner shall be disposed of by one of the following methods or an equivalent method approved by the Director and EPA:
    i) Reduction of the waste material to less than 20 percent VOC solvent by distillation and proper disposal of the still bottom waste; or
    ii) Stored in closed containers for transfer to a contract reclamation service or disposal facility approved by the Director and EPA.
f) Waste solvent shall be stored in covered containers only.

9) Operators must be trained as follows:
    a) Only persons trained in at least the operation and equipment requirements specified in this rule for their particular solvent metal cleaning process to operate this equipment;
    b) The person who supervises any person who operates solvent cleaning equipment regulated by this rule shall receive equal or greater operational training than the operators; and
    c) A procedural review shall be given to all solvent metal cleaning equipment operators at least once each 12 months.

Monitoring/Recordkeeping:

1) The permittee shall maintain the following records for each purchase of cold cleaner solvent (Attachment G):
    a) Name and address of the solvent supplier.
    b) Date of purchase.
    c) Type of solvent purchased.
    d) Vapor pressure of solvent in mm Hg at 20°C or 68°F.
2) The permittee shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. (see Attachment E). The record also shall include maintenance and repair logs that occurred on the degreaser (Attachments F). These records shall be kept current and made available for review on a monthly basis. The Director may require additional recordkeeping if necessary to adequately demonstrate compliance with this rule.
3) The permittee shall keep training records of solvent metal cleaning for each employee on an annual basis (Attachment H).
4) All records shall be retained for five years and be available to the Director upon request.
5) The permittee may use Attachments E, F, G and H, or equivalent forms of its own, so long as the forms used will accurately demonstrate compliance with the recordkeeping requirements.

Reporting:
Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

EU18 – Underground Gasoline Storage Tank with Dispensers		
Emission Unit	Description	2010 EIQ Reference #
EU18	Underground Gasoline Storage Tank (UST) – 6,000 gallon storage capacity with vehicle loading gasoline dispensers.	EP18

Permit Condition EU18-001

10 CSR 10-6.065 Operating Permits
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:
The gasoline throughput shall not exceed 250,000 gallons in any consecutive twelve (12)-month period.

Monitoring/Recordkeeping:
The permittee shall maintain an accurate record of the gasoline throughput on monthly and running 12-month totals. Example form is attached as Attachment I (Gasoline Throughput Log). The permittee may use this form, or forms of its own, so long as the forms used will accurately demonstrate compliance with the paint and solvent usage limit.

Reporting:
The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen days after any deviation from or exceedance of any of the terms imposed by this permit condition, or any malfunction which causes a deviation from or exceedance of this permit condition.

Permit Condition EU18-002

10 CSR 10-5.220
Control of Petroleum Liquid Storage, Loading and Transfer

General Provisions:
1) Gasoline Transfer [10 CSR 10-5.220(3)(C)]
   a) No owner or operator of a gasoline storage tank or delivery vessel shall cause or permit the transfer of gasoline from a delivery vessel into a gasoline storage tank with a capacity greater than five hundred (500) gallons unless—
      i) The storage tank is equipped with a submerged fill pipe extending unrestricted to within six inches (6") of the bottom of the tank, and not touching the bottom of the tank, or the storage tank is equipped with a system that allows a bottom fill condition;
      ii) All storage tank caps and fittings are vapor-tight when gasoline transfer is not taking place; and
      iii) Each storage tank is vented via a conduit that is—
         (1) At least two inches (2") inside diameter; and

(2) At least twelve feet (12') in height above grade; and
(3) Equipped with a pressure/vacuum valve that is California Air Resources Board (CARB) certified and MO/PETP approved at three inches water column pressure/eight inches water column vacuum (3"wcp/8"wcv) except when the owner or operator provides documentation that the system is CARB certified or Missouri Performance Evaluation Test Procedures (MO/PETP) approved for a different valve and will not function properly with a 3"wcp/8"wcv valve. Initial fueling of motor vehicle systems and ancillary refueling systems previous MO/PETP approval applies for pressure/vacuum values.

b) Stationary storage tanks having a volume greater than one thousand (1,000) and less than forty thousand (40,000) gallons shall also be equipped with a Stage I vapor recovery system that has a collection efficiency of ninety-eight percent (98%) that is based on MO/PETP, and the delivery vessels to these tanks shall be in compliance with Subsection (3)(D) of 10 CSR 10-5.220.
   i) The vapor recovery system shall collect no less than ninety-eight percent (98%) by volume of the vapors displaced from the stationary storage tank during gasoline transfer and shall return the vapors via a vapor-tight return line to the delivery vessel. All fill ports and vapor ports shall have Mo/PETP poppeted fittings.
   ii) A delivery vessel shall be reloaded only at installations complying with the provisions of Subsection (3)(B) of 10 CSR 10-5.220.
   iii) This subsection shall not be construed to prohibit safety valves or other devices required by governmental regulations.

2) Fueling of Motor Vehicles [10 CSR 10-5.220(3)(E)]
   a) Except as provided in Subsections (3)(A)–(C) of 10 CSR 10-5.220, no owner or operator shall install, permit the use of or maintain any stationary gasoline tank with a capacity of more than one thousand (1,000) gallons or operate an installation with a monthly throughput of greater than ten thousand (10,000) gallons of gasoline through tanks in the one thousand (1,000) gallon or smaller class unless the storage tank(s) is equipped with a vapor recovery system. The system shall be approved by the staff Director based on the MO/PETP and shall be capable of—
      i) Collecting the hydrocarbon vapors and gases discharged during motor vehicle fueling;
      ii) Preventing their emission into the atmosphere; and
      iii) Maintaining ninety-five percent (95%) efficiency of total capture and emission reduction.
   b) For the purpose of Subsection (3)(E) of 10 CSR 10-5.220, no vapor recovery systems or devices shall be installed, used or maintained until they are permitted by the Director in accordance with Subsections (3)(H) and (I) of 10 CSR 10-5.220.
   c) All tank gauging and sampling sites or ports, valves, breakaways, joints and disconnects on the vapor recovery systems shall be gas-tight to prevent VOC emissions except during gauging or sampling.
   d) All vapor recovery systems shall be maintained in good working order in accordance with the manufacturer’s specifications and with no indication of visible liquid leaks.
   e) The operator of each affected installation shall post operation instructions conspicuously in the gasoline dispensing area for the system in use at each station. The instructions shall clearly describe how to fuel vehicles correctly with vapor recovery nozzles utilized at that station. The instructions shall also include a warning that repeated attempts to continue dispensing gasoline after the system has indicated that the vehicle fuel tank is full may result in spillage of gasoline.
   f) The operator of each affected installation shall ensure dispensing gasoline meets the requirements of 40 CFR 80.22(j) promulgated June 26, 1996 and hereby incorporated by reference in this rule, as published by the Office of Federal Register, U.S. National Archives and

Records, 700 Pennsylvania Avenue NW, Washington, D.C. 20408. This rule does not incorporate any subsequent amendments or additions.

g) The staff Director shall identify and list specific defects that substantially impair the effectiveness of components or systems used for the control of gasoline vapors resulting from motor vehicle fueling operations. This ongoing list shall be used by the staff Director as a basis for marking the components or systems out-of-order and shall be made available to any gasoline dispensing installations subject to Paragraph (3)(E)1. of 10 CSR 10-5.220. The list shall be made available to the installation's designated person for use in performing system maintenance.

h) Upon the staff Director's identification of substantial defects in equipment or installation of a gasoline vapor control system, the system or components shall be marked "out-of-order" and no person shall use or permit the use of that system or component until those defects and all other defects have been repaired, replaced or adjusted to establish compliance. The components or system may be released into operation when the staff Director has reinspected the installation; found the system and components to be in good working order; and removed the "out-of-order" notice. The staff Director shall reinspect the previously marked "out-of-order" system or component and other noted defects as expeditiously as possible after notification from the operator that the repairs have been completed. In no case shall the reinspection be more than four (4) business days from the operator's notification that the repairs have been completed. In those cases in which the reinspection cannot be scheduled within the required time, the owner or operator may remove the "out-of-order" notice with permission of the staff Director. If reinspection reveals that compliance has not been established, the system or components shall remain tagged "out-of-order." The staff Director shall conduct a second reinspection within seven (7) business days from the operator's notification that repairs have been completed.

3) Permits Required [10 CSR 10-5.220(3)(G), (H) and (I)]
The permittee shall comply with the vapor recovery system permitting requirements of 10 CSR 10-5.220(3)(G), (H) and (I). The installation has obtained several permits from the Department of Natural Resources. The most current vapor recovery system operating permit was issued to the installation on November 6, 2007. The term of the vapor recovery operating permit is five (5) years.

Compliance Demonstration:

Owner/Operator Compliance: [10 CSR 10-5.220(3)(J)]
The owner or operator of a vapor recovery system subject to this rule shall—

1) Operate the vapor recovery system and the gasoline loading equipment in a manner that prevents—
   a) Gauge pressure from exceeding four thousand five hundred (4,500) pascals (eighteen inches (18") of H_2O) in the delivery vessel; [10 CSR 10-5.220(3)(J)1.]
   b) A reading equal to or greater than one hundred percent (100%) of the lower explosive limit (LEL), measured as propane at two point five (2.5) centimeters from all points on the perimeter of a potential leak source when measured by the method referenced in 10 CSR 10-6.030(14)(E) during loading or transfer operations; and
   c) Visible liquid leaks during loading or transfer operations; and
2) Repair and retest within fifteen (15) days, a vapor recovery system that exceeds the limits in Paragraph (3)(J)1. of 10 CSR 10-5.220.

Reporting and Recordkeeping:

1) The owner or operator of stationary storage tanks subject to gasoline transfer Subsection (3)(C) 10 CSR 10-5.220 keep records documenting the vessel owners and number of delivery vessels unloaded by each owner. Records shall be kept for two (2) years and made available to the staff Director

within five (5) business days of a request. The owner or operator shall retain on-site copies of the loading ticket, manifest or delivery receipt for each grade of product received, subject to examination by the staff Director upon request. If a delivery receipt is retained rather than a manifest or loading ticket, the delivery ticket shall bear the following information: vendor name, date of delivery, quantity of each grade, and the manifest or loading ticket number. The required retention on-site of the loading ticket, manifest or delivery receipt shall be limited to the four (4) most recent records for each grade of product.

2) The owner or operator of a vapor recovery system subject to Subsection (3)(J) of 10 CSR 10-5.220 shall maintain records of Department permits, inspection reports, enforcement documents, training certifications, gasoline deliveries, routine and unscheduled maintenance and repairs and all results of tests conducted. Unless otherwise specified in this rule, records shall be kept for two (2) years and made available to the staff Director within five (5) business days of a request.

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 is only an excerpt from the regulation or code, and is provided for summary purposes only.

City of St. Louis Ordinance 68657, §16 Open Burning Restrictions

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

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

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
   i) Measures taken to mitigate the extent and duration of the excess emissions; and
   j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other

pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.

4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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

10 CSR 10-6.100 Alternate Emission Limits

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

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

1) The permittee shall submit 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) The permittee may be required by the director to file additional reports.

3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
4) The permittee shall submit a full EIQ for the 2011, 2014, 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.
5) 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.
6) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
7) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
8) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
9) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

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

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 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited

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

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

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

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

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

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

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

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
   b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.

b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

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

iii) 10 CSR 10-6.070, “New Source Performance Standards”;
iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”; or

b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

10 CSR 10-6.065, §(5)(E)2 and §(6)(C)1.B Permit Duration
This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Recordkeeping and Reporting Requirements
1) Recordkeeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
2) Reporting
   a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
   b) The permittee shall submit a report of all required monitoring by:
      i) April 1st for monitoring which covers the January through December time period.
      ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
   c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit.
   d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
      i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

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

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

1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.

6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios
None.

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

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

e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

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

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

1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
   a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
   b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This 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 Mike Burke, Executive Vice President/General Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the

Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

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

10 CSR 10-6.065 §(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 - Plant-Wide Voluntary Emissions Limit

Plant-Wide VOC Emissions Tracking Record

This is an example of a form that may be used to record data required by Permit Conditions PW001. In order to demonstrate compliance with the Permit Condition PW001, Alberici Constructors must demonstrate the installation emits less than 100 tons of VOC in any consecutive 12-month period.

Emission Unit	Month												12 Month Rolling Average
	1	2	3	4	5	6	7	8	9	10	11	12	
Total													

Attachment B – Visible Emission Observation

10 CSR 10-6.400 Compliance Demonstration

Date	Time	Visible Emissions (yes/no)	Visible emissions		Observer Signature
			Cause	Corrective Action	

Attachment C – Surface Coating Operations Compliance Demonstration

10 CSR 10-5.330, *Control of Emissions From Industrial Surface Coating Operations*
Compliance Demonstration - Sample Record Form

Daily Record of Substances Used for Coating, Thinning, Purging, and Equipment Cleaning Record

Date	Substance	CAS	Gallons Used Daily	Lbs VOC/gal (less water & non-VOC organic compounds)	Purpose (used for)

Attachment D - Surface Coating Operations Compliance Demonstration

10 CSR 10-5.330, *Control of Emissions From Industrial Surface Coating Operations* - Compliance Demonstration - Sample Record Form

Date	Coating Ingredient	Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H
		Enter These Values from Coating Formulation Data				Coating Volume Friction (minus water & non-VOC organic compounds)	Daily Coating Gallons Used (minus water & non-voc organic compounds)	lbs VOC per Gallon (minus water & non-voc organic compounds)	Volume-Weighted Daily lbs of VOC
		Daily Coating Gallons Used	lbs VOC per Gallon of Coating	Water Volume Fraction of Coating	Non-VOC Organic Compounds Volume Fraction of Coating				
Sum of Column F (gallons):									
Sum of Column H (lbs)									
[1]Daily Volume-Weighted Average ($DAVG_{vw}$) = _____ lbs of VOC/gal coating (less water & non-VOC organic Compounds)									

Note 1: Daily Volume-Weighted Average ($DAVG_{vw}$) = [Sum of Column H ÷ Sum of Column F]

Instructions:

1. Enter values for Columns A, B, C and D from coating formulation data.
2. Calculate volume fraction of coating (minus water & non-VOC organic compounds): [Column E = 1 – (Column C + Column D)]
3. Calculate the daily coating used (minus water & non-voc organic compounds) in gallons in Column F by multiplying daily coating used in gallons [Column A] by volume fraction of coating (minus water & non-VOC organic compounds) (Column E): Column F = [Column A x Column E]
4. Calculate lbs VOC per gallon (minus water & non-voc organic compounds) per coating ingredient in Column G by dividing lbs of VOC per gallon of coating (Column A) by volume fraction of coating (minus water & non-VOC organic compounds) (Column E): Column G = [Column B ÷ Column E]
5. Calculate the volume weighted daily lbs of VOC in Column H per coating ingredient by multiplying the daily coating gallons used (minus water & non-VOC organic compounds (Column F) by lbs VOC per gallon (minus water & non-voc organic compounds) per coating ingredient (Column G): Column H = [Column F x Column G]

Calculate Daily Volume-Weighted Average (lbs of VOC per gal coating (less water & non-VOC organic compounds)) by dividing the daily sum of Column H by daily sum of Column F.

Attachment E - Solvent Containing Waste Transfer Log

10 CSR 10-5.300 Compliance Demonstration

Date	Amount of Total Solvent Transferred (gallons)	Amount of Solvent Transferred to a Contract Reclamation Service (gallons)	Amount of Solvent Transferred to a Disposal Facility (gallons)	Amount of Solvent Distilled on the Premises (gallons)

Attachment F - Inspection/Maintenance/Repair/Malfunction Log

10 CSR 10-5.300 Compliance Demonstration

Date	Equipment/Emission Unit	Activities Performed

Attachment G - Purchase Records for Cold Cleaning Solvent

10 CSR 10-5.300 Compliance Demonstration

Date	Solvent Supplier Name	Solvent Supplier Address	Type of Solvent	Solvent Volatility in mmHg at 20°C (68°F)

Attachment H - Employee Solvent Metal Cleaning Training Log

10 CSR 10-5.300 Compliance Demonstration

Date	Title of Solvent Metal Cleaning Training Course	Instructor

Attachment I – Gasoline Throughput Log
Gasoline UST
Monthly & 12-month Gasoline Throughput Recordkeeping Form

Date/Month	Monthly Gasoline Throughput (gallons)	12-Month Total Gasoline Throughput (gallons)

Attachment J - Individual HAP Emission Tracking Sheet

Highest Individual HAP Emission Tracking Sheet

This form is an example of a form which may be used to record data required by Permit Condition PW002. In order for the permittee to demonstrate compliance with the voluntary individual HAP limit(s), the permittee must demonstrate that the annual emissions of any one individual hazardous air pollutant will not exceed 10 tons in any consecutive 12-month period.

12 Month Rolling Average Recordkeeping Report
Highest Individual HAP Emission by Emission Unit (tons)

Emission Unit	Month												12 Month Rolling Average
	1	2	3	4	5	6	7	8	9	10	11	12	
Total													

Attachment K - Total HAPs Emission Tracking Sheet
Total HAPs Emission

This form is an example of a form which may be used to record data required by this Permit Condition PW002. In order for the permittee to demonstrate compliance with the voluntary aggregate HAP limit(s), the permittee must demonstrate that the emissions of all hazardous air pollutants combined will not exceed 25 tons in any consecutive 12-month period.

12 Month Rolling Average Recordkeeping Report
Total HAPs Emission by Emission Unit (tons)

Emission Unit	Month												12 Month Rolling Average
	1	2	3	4	5	6	7	8	9	10	11	12	
Total													

STATEMENT OF BASIS

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

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

1) Intermediate Operating Permit Amendment, received May 21, 2012;
2) 2011 Emissions Inventory Questionnaire, received March 25, 2011; and
3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits
In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

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.

1) St. Louis City Ordinances Nos. 64749, 65108, 65488, 65442 and 65645
   These ordinances were reviewed and considered at the time the application for this permit was submitted. Since that time, these ordinances have been repealed and replaced with St. Louis City Ordinance No. 68657. The only section of Ordinance 65645 that corresponds to a rescinded ordinance included in the State SIP and therefore federally enforceable is Section 16 - Open Burning Restrictions. This section of the new ordinance is the only section included in the operating permit at this time.

2) Equipment Paint Booth (EP15)
   10 CSR 10-5.330, *Control of Emissions from Industrial Surface Coating Operations* does not apply to the Equipment Paint Booth referenced as EP15 in the 2011 EIQ and EU0040 in the Intermediate Permit OP2012-006. The Equipment Paint Booth falls into exemptions 10 CSR 10-5.330(1)(D)1., 10 CSR 10-5.330(1)(D) 2. and 10 CSR 10-5.330(1)(D) 13.

3) 10 CSR 10-5.455, *Control of Emission from Industrial Solvent Cleanup Operations*.
This rule applies to any person who performs or allows the performance of any cleaning operation involving the use of organic solvent or solvent solution.

The maintenance shop solvent cleanup operation (EP6) uses less than one and one-quarter (1.25) gallons of aerosol products per day, therefore, according to Subsection (1)(C) of this rule, the cleanup operation is exempt from the requirements of Subsection (3)(A), *General Provisions*, of this rule.

Construction Permit Revisions

None.

New Source Performance Standards (NSPS) Applicability

There are no NSPS standards that are currently applicable to this installation.

Maximum Achievable Control Technology (MACT) Applicability

1) 40 CFR Part 63, Subpart XXXXXX – *National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories*
40 CFR Part 63, Subpart XXXXXX is not applicable to Alberici and has not been applied within this permit. This subpart is applicable to sources listed under NACIS codes 332111, 332117, 332312, 332313, 332410, 332420, 332618, 332919, 332999, 333120, 333132, 333414, 333911, 335312 and 335999 per EPA's guidance document SIC/NAICS Code Applicability Charts for Nine Metal Fabrication and Finishing Sources available at: http://www.epa.gov/ttn/atw/area/met-fab-6x-applicability.xls.

Alberici performs the metal fabrication and finishing processes addressed by this rule, but Alberici is not classified under any of the listed NACIS codes. Its NACIS classification is 237310 (Highway, Street, and Bridge Construction), however, part of the operation includes a structural steel fabrication facility. This portion of the facility is less than 50 percent of the total production and therefore the facility is not "primarily engaged" in one of the nine metal fabrication and finishing source categories and will not be subject to this rule.

2) 40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*
The cleaning solvents covered by the MACT standard are solvents containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

The installation operates cold cleaners that use non halogenated solvent as the cleaning solvent. Therefore, the installation is not subject to 40 CFR Part 63, Subpart T.

3) 40 CFR Part 63, Subpart HHHHHH - *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*
This rule applies to area sources that engage in spray application of coatings to a plastic and/or metal substrate where the coatings contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

According to Alberici, the coatings being used do not contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd), referred as the target HAPs in the rule. Therefore, the installation is not subject to 40 CFR Part 63, Subpart HHHHHH.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61 Subpart M - *National Emission Standard for Asbestos*, §61.145(a), Standard for demolition and renovation, applies to the installation.

This regulation has been included in the operating permit because it applies to any demolition or renovation (as outlined in 40 CFR 61.145) of buildings containing asbestos at the installation.

Greenhouse Gas Emissions

On May 13, 2010, EPA issued the GHG Tailoring Rule which set the major source threshold for CO_2e to be 100,000 tons per year within 40 CFR Part 70. Potential emissions of greenhouse gases (CO_2e) for this installation are much less than the major source threshold, classifying the installation as a minor source of GHGs. There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO_2e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO_2e emissions were not included within this permit.

Other Regulatory Determinations

1) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*
10 CSR 10-6.400 limits the amount of particulate matter that is allowed from an emission unit, and is dependent on the process weight rate material processed excluding liquids and gases used solely as fuels and excluding air introduced for purposes of combustion.

The installation operates shot blast station equipped with dry filters that are subject to 10 CSR 10-6.400 and could be quantified by the test methods used to determine compliance. The following calculations provide the allowable particulate emission rate based on 10 CSR 10-6.400 and the potential (maximum) emission rate. Process information and data used in these calculations are from the Intermediate Operating Permit Renewal Application, 2010 EIQ, Alberici's letter dated September 22, 2011, AP-42 Section 13.2.6 - Abrasive Blasting (SCC 3-09-002-04). Also, the following formula from 10 CSR 10-6.400 is used to calculate the PM allowable limit:

$E = 4.10P^{0.67}$ for process weight rates up to 30 tons (60,000 lbs) per hour,
$E = 55.0P^{0.11} - 40$ for process weight rates greater than 60,000 lb/hr, and
Where: E = rate of emission in lb/hr; and
P = process weight rate in tons/hr (maximum hourly design rate)

Emission Unit #	Maximum Design Rate (tons/hr)	PM Fabric Filter Controlled Emission Factor (lb/1000 lb abrasive)	PM Potential Emissions (lbs/hr)		PM Allowable Emission Rate (lb/hr)
			Controlled	Uncontrolled	
EU5A	23.625	0.69	0.33	32.60	34.11
EU5B	37.125	0.69	0.51	51.23	41.85

According to the source registration permit issued by the City of St. Louis Air Pollution control Program on December 30, 1986, the control equipment is about 99 percent efficient.

The permittee is required to monitor the corresponding emission control equipment and adhere to recordkeeping and reporting requirements.

2) 10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air Beyond the premises of Origin*
Though the level of particulate emissions are negligible, Alberici has procedures to control potential fugitive particulate emissions generated whenever vehicles travel over paved/unpaved surfaces such as a roads or parking lots by performing Best Management Practices, which include the usage of paving and dust suppression techniques (chemical dust suppressants or watering).

3) The units listed in the "Emission Units Without Limitations" section of this permit either have no applicable regulations associated with them or are considered insignificant activities by the operating permit application. Those units include, but are not limited to, miscellaneous welding, miscellaneous solvent cleanup and all natural gas/LPG units with a maximum heat input of less than ten (10) MMBtu/hr and those that burn other fuels and have a heat input of less than one (1) MMBtu/hr that emits only products of combustion

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.
1) The specific pollutant regulated by that rule is not emitted by the installation.
2) The installation is not in the source category regulated by that rule.
3) The installation is not in the county or specific area that is regulated under the authority of that rule.
4) The installation does not contain the type of emission unit which is regulated by that rule.
5) The rule is only for administrative purposes.

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

Prepared by:

Berhanu A. Getahun
Environmental Engineer

Mr. Mike Burke
Alberici Constructors, Inc.
DBA Hillsdale Fabricators, Inc.
2150 Kienlen Avenue
St. Louis, MO 63121-5505

Re: Alberici Constructors, Inc., Hillsdale Fabricators, Inc., 510-1642
Permit Number: OP2012-006A

Dear Mr. Burke:

Enclosed with this letter is your amended intermediate operating permit. The amendment incorporates into the operating permit federally enforceable emission limitations which limit hazardous air pollutant (HAP) emissions to below the major source threshold levels. This amendment also clarifies the applicability of 10 CSR 10-5.330 and 10 CSR 10-5.455 to certain emissions units within the installation. Please note this amendment does not alter or change the expiration date of the permit, which remains February 6, 2017. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 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 do not hesitate to contact Berhanu Getahun at the St. Louis Regional Office, 7545 S. Lindbergh, Suite 210, St. Louis, MO 63125, or by telephone at (314) 416-2960. You may also contact me with the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS/bgk

Enclosures

c: St. Louis Regional Office
PAMS File: 2012-05-087

MEMORANDUM

DATE: September 25, 2012

TO: 2012-05-087, Alberici Constructors, Inc. dba Hillsdale Fabricators

FROM: Berhanu A. Getahun, Environmental Engineer

SUBJECT: Response to Public Comments

The draft Amended Intermediate Operating Permit for Alberici Constructors, Inc. dba Hillsdale Fabricators was public noticed on the Department's web page at: http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm on August 13, 2012 for a 30-day comment period. The Air Pollution Control Program did not receive any comments from either the public or the applicant during the 30-day comment period.

BAG/kjc