



PART 70 PERMIT TO OPERATE

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

Operating Permit Number: OP2012-024
Expiration Date: MAY 24 2017
Installation ID: 207-0007
Project Number: 2011-04-021

Installation Name and Address

Ames True Temper, Inc.
206 East Hunts Road
Bernie, MO 63822
Stoddard County

Parent Company's Name and Address

Ames True Temper, Inc.
465 Railroad Avenue
P.O. Box 8859
Camp Hill, PA 17011

Installation Description:

This installation manufactures wood handles for various hand held pieces of equipment. The wood handle process includes sawing, drying, and lathing of lumber. The installation is an area source of Hazardous Air Pollutants (HAPs) and is subject to 40 CFR Part 63 Subpart JJJJJ-National Emissions Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources.

MAY 25 2012

Effective Date


Director or Designee

Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Ames True Temper manufactures wood tool handles at its installation in Bernie, Missouri. Raw lumber is brought into the installation and dried in kilns. The dried lumber is then brought to a saw line, a lathe room or a pattern lathe and profiler room where it is formed into tool handles. The sawdust from the lathe room (EU0020) is controlled by two cyclones (EP6 and EP7). The saw line and grinder (EU0010) is controlled by another cyclone (EP3) and the pattern lathe and profiler room (EU0060) is also controlled by a cyclone (EP11). The pattern lathe and profiler room cyclone (EP11) is controlled by a baghouse which is being used to return air to the pattern lathe and profiler room. The sawdust from the cyclones, grinder and baghouse is then collected and stored in a silo where fed by auger to a boiler. The installation has two boilers. An AFS Injection Stoker Boiler is currently in use and a Marion Steam Shovel Boiler is currently used only in case of emergency. The boiler is used to heat the facility as well as supply heat to the wood drying kilns. The boiler room with the silo is controlled by its own building enclosed cyclone. The installation also has a resin storage tank which stored polyester resin that was used to coat handles. The installation no longer uses polyester resin and the tanks are inactive.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2010	2009	2008	2007	2006
Particulate Matter ≤ Ten Microns (PM ₁₀)	4.67	4.27	4.26	2.75	28.45
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	2.34	2.14	2.07	1.38	14.22
Sulfur Oxides (SO _x)	0.041	0.038	0.036	0.024	0.22
Nitrogen Oxides (NO _x)	0.89	0.81	0.76	0.51	4.76
Volatile Organic Compounds(VOC)	0.83	0.76	0.71	0.48	5.62
Carbon Monoxide (CO)	8.04	7.36	6.92	4.62	43.19
Lead (Pb)	0.00	0.00	0.00	0.00	0.00
Hazardous Air Pollutants (HAPs) ¹	0.00	0.00	0.00	0.00	0.00
Ammonia (NH ₃)	0.00	0.00	0.00	0.00	0.00

¹The installation was below the reporting threshold for HAP and did not report any HAP emissions as PM or VOC

Note: The decrease in PM, NO_x, VOC, and CO emissions coincides with the removal of the pultrusion lines

EMISSION UNITS WITH LIMITATIONS

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EU0010	Sawline and grinder
EU0020	Lathe Room
EU0030	Silo System
EU0040	3.2 MMBtu/hr Marion Steam Shovel Boiler
EU0050	7.73 MMBtu/hr AFS Injection Stoker Boiler

EMISSION UNITS WITHOUT LIMITATIONS

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

<u>Description of Emission Source</u>
Pattern Lathe and Profiler Room (EU0060)
5000 gallon polyester resin storage tank
Sawdust and Shavings Pile (EP5)

II. Plant Wide Emission Limitations

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

None

III. Emission Unit Specific Emission Limitations

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

EU0010 through EU0050- Woodworking Equipment, Silo, and Boilers		
Emission Unit	Description	Manufacturer/Model #
EU0010	3 equalizer saws, 2 trim saws, sawline grinder all controlled by cyclone (EP3). Saws installed 1955. Grinder installed in 2000.	Unknown
EU0020	Lathe Room consisting of 18 lathes, 2 equalizer saws, 2 slot saws, 2 sanders controlled by cyclone (EP7). 4 band saws, and 4 sanders controlled by cyclone (EP6). Constructed 1955	Unknown
EU0030	Silo System used to feed boiler. Constructed in 2000. Controlled by cyclone	Unknown
EU0040	Wood fired Marion Steam Shovel Boiler. Boiler installed in 1955. Rated at 3.2 MMBtu/hr	Unknown
EU0050	Wood fired AFS Injection Stoker Boiler. Boiler installed in 2000. Rated at 7.73 MMBtu/hr	AFS/GL150-22-GS

<p>PERMIT CONDITION (EU0010 through EU0030)-001 and EU0050-001 10 CSR 10-6.060, Construction Permits Required Construction Permit # 062000-024, Issued June 19, 2000</p>

Emission Limitation

1. The permittee shall emit into the atmosphere from the proposed equipment (EU0010 through EU0030 and EU0050) less than 15 tons of particulate matter less than ten microns (PM₁₀) in diameter in any consecutive twelve-month period. [Special Condition 1A]
2. The cyclones associated with the lathe room (EU0020), saw line grinder (EU0010), and silo system (EU0030) must be in use at all times when the associated equipment is in operation. The cyclones and any related instrumentation or equipment shall be operated and maintained in accordance with the manufacturer's specifications. [Special Condition 2A]

Monitoring

The permittee shall inspect the cyclone at least once every six months and at a minimum conduct the following activities:

1. Check the cleaning sequence of the cyclone for proper operation;
2. Inspect all components of the control system that are not subject to wear or plugging, including structural components, housing, ducts, hoods, etc.; and
3. If leaks or abnormal conditions are found during these inspections the appropriate remedial actions shall be implemented before re-starting the equipment. [Special Condition 2B]

Recordkeeping

1. The permittee shall maintain an operating, maintenance, and inspection log for the cyclone which shall include the following:
 - a) Incidents of malfunction(s) including the date(s) and duration of the event, the probable cause, any corrective actions taken and the impact on emissions due to the malfunction;
 - b) Any maintenance activities conducted on the unit, such as replacement of equipment, etc.; and
 - c) A written record of regular inspection schedule, the date and results of all inspections including any actions or maintenance activities that result from that inspection.[Special Condition 2C]
2. The permittee shall maintain the monthly and the sum of the most recent consecutive twelve-month records of the PM₁₀ emissions from the proposed equipment. Attachment F or an equivalent form may be used to demonstrate compliance. These forms shall be maintained on site for 5 years and shall be made available for inspection to the Missouri Department of Natural Resources' personnel upon request. [Special Condition 1B]

Reporting

1. 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 days after the end of the month during which the source exceeds the emission limitations above.
2. The permittee shall report any deviations from the standards, monitoring/testing, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit

PERMIT CONDITION EU0040-001 and EU0050-002

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63 Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

Work Practice Standards

1. You must conduct a tune-up of the boiler biennially as specified in §63.11223. [§63.11201(b) and Table 2 to Subpart JJJJJ of 40 CFR Part 63]
2. These standards apply at all times. [§63.11201(d)]

General Compliance Requirements

At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Director that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.11205(a)]

Initial Compliance Requirements

You must conduct a performance tune-up according to §63.11223(b) and you must submit a signed statement in the Notification of Compliance Status report that indicates that you conducted a tune-up of the boiler. [§63.11214(b)]

Continuous Compliance Requirements

1. You must conduct a biennial performance tune-up according to (2) below and keep records as required in §63.11225(c) to demonstrate continuous compliance. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. [§63.11223(a)]
2. You must conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in 2(a) through (g) below. [§63.11223(b)]
 - a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, but you must inspect each burner at least once every 36 months). [§63.11223(b)(1)]
 - b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available. [§63.11223(b)(2)]
 - c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. [§63.11223(b)(3)]
 - d) Optimize total emissions of carbon monoxide. This optimization should be consistent with the manufacturer's specifications, if available. [§63.11223(b)(4)]
 - e) Measure the concentrations in the effluent stream of carbon monoxide in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). [§63.11223(b)(5)]
 - f) Maintain onsite and submit, if requested by the Director, biennial report containing the information in f(i) through (iii) below. [§63.11223(b)(6)]
 - i. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up of the boiler. [§63.11223(b)(6)(i)]
 - ii. A description of any corrective actions taken as a part of the tune-up of the boiler. [§63.11223(b)(6)(ii)]
 - iii. The type and amount of fuel used over the 12 months prior to the biennial tune-up of the boiler. [§63.11223(b)(6)(iii)]
 - g) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within one week of startup. [§63.11223(b)(7)]

Recordkeeping

1. As required in §63.10(b)(2)(xiv), you must keep a copy of each notification and report that you submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted. [§63.11225(c)(1)]
2. You must keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 as specified in 2(a) below. [§63.11225(c)(2)]
 - a) Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned. [§63.11225(c)(2)(i)]
3. Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment. [§63.11225(c)(4)]
4. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation. [§63.11225(c)(5)]

5. Your records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). As specified in §63.10(b)(1), you must keep each record for five years following the date of each recorded action. You must keep each record onsite for at least two years after the date of each recorded action according to §63.10(b)(1). You may keep the records off site for the remaining three years. [§63.11225(d)]

Reporting

1. If you intend to commence or recommence combustion of solid waste, you must provide 30 days prior notice of the date upon which you will commence or recommence combustion of solid waste. The notification must identify: [§63.1125(f)]
 - a) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that will commence burning solid waste, and the date of the notice. [§63.1125(f)(1)]
 - b) The currently applicable subcategory under this subpart. [§63.11225(f)(2)]
 - c) The date on which you became subject to the currently applicable emission limits. [§63.1125(f)(3)]
 - d) The date upon which you will commence combusting solid waste. [§63.11225(f)(4)]
2. If you intend to switch fuels, and this fuel switch may result in the applicability of a different subcategory or a switch out of Subpart JJJJJ due to a switch to 100 percent natural gas, you must provide 30 days prior notice of the date upon which you will switch fuels. The notification must identify: [§63.11225(g)]
 - a) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that will switch fuels, and the date of the notice. [§63.11225(g)(1)]
 - b) The currently applicable subcategory under this subpart. [§63.11225(g)(2)]
 - c) The date on which you became subject to the currently applicable standards. [§63.11225(g)(3)]
 - d) The date upon which you will commence the fuel switch. [§63.11225(g)(4)]
3. In response to an action to enforce the standards set forth in Paragraph §63.11201 you may assert an affirmative defense to a claim for civil penalties for exceedances of numerical emission limits that are caused by malfunction, as defined at §63.2. Appropriate penalties may be assessed, however, if you fail to meet your burden of proving all of the requirements in the affirmative defense. The affirmative defense shall not be available for claims for injunctive relief. [§63.11226]
4. To establish the affirmative defense in any action to enforce such a limit, you must timely meet the notification requirements in Paragraph (b) of this section, and must prove by a preponderance of evidence that: [§63.11226(a)]
 - a) The excess emissions: [§63.11226(a)(1)]
 - i. Were caused by a sudden, infrequent, and unavoidable failure of air pollution control and monitoring equipment, process equipment, or a process to operate in a normal or usual manner, and [§63.11226(a)(1)(i)]
 - ii. Could not have been prevented through careful planning, proper design or better operation and maintenance practices; and [§63.11226(a)(1)(ii)]
 - iii. Did not stem from any activity or event that could have been foreseen and avoided, or planned for; and [§63.11226(a)(1)(iii)]
 - iv. Were not part of a recurring pattern indicative of inadequate design, operation, or maintenance; and [§63.11226(a)(1)(iv)]
 - b) Repairs were made as expeditiously as possible when the applicable emission limitations were being exceeded. Off-shift and overtime labor were used, to the extent practicable to make these repairs; and [§63.11226(a)(2)]

- c) The frequency, amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent practicable during periods of such emissions; and [§63.11226(a)(3)]
 - d) If the excess emissions resulted from a bypass of control equipment or a process, then the bypass was unavoidable to prevent loss of life, personal injury, or severe property damage; and [§63.11226(a)(4)]
 - e) All possible steps were taken to minimize the impact of the excess emissions on ambient air quality, the environment and human health; and [§63.11226(a)(5)]
 - f) All emissions monitoring and control systems were kept in operation if at all possible, consistent with safety and good air pollution control practices; and [§63.11226(a)(6)]
 - g) All of the actions in response to the excess emissions were documented by properly signed, contemporaneous operating logs; and [§63.11226(a)(7)]
 - h) At all times, the facility was operated in a manner consistent with good practices for minimizing emissions; and [§63.11226(a)(8)]
 - i) A written root cause analysis has been prepared, the purpose of which is to determine, correct, and eliminate the primary causes of the malfunction and the excess emissions resulting from the malfunction event at issue. The analysis shall also specify, using best monitoring methods and engineering judgment, the amount of excess emissions that were the result of the malfunction. [§63.11226(a)(9)]
5. *Notification.* The owner or operator of the facility experiencing an exceedance of its emission limit(s) during a malfunction shall notify the Director by telephone or facsimile (FAX) transmission as soon as possible, but no later than two business days after the initial occurrence of the malfunction, if it wishes to avail itself of an affirmative defense to civil penalties for that malfunction. The owner or operator seeking to assert an affirmative defense shall also submit a written report to the Director within 45 days of the initial occurrence of the exceedance of the standard in §63.11201 to demonstrate, with all necessary supporting documentation, that it has met the requirements set forth in (4) above. The owner or operator may seek an extension of this deadline for up to 30 additional days by submitting a written request to the Director before the expiration of the 45 day period. Until a request for an extension has been approved by the Director, the owner or operator is subject to the requirement to submit such report within 45 days of the initial occurrence of the exceedance. [§63.11226(b)]
6. The permittee shall report any deviations from the standards, monitoring/testing, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit

PERMIT CONDITION (EU0010 and EU0030)-002 and EU0050-003

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitation

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

Monitoring/Recordkeeping/Reporting

As detailed in core permit requirements.

PERMIT CONDITION (EU0020 and EU0040)-002

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitation

1. No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any **existing** source any visible emissions with an opacity greater than 40 percent.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring/Recordkeeping/Reporting

As detailed in core permit requirements.

PERMIT CONDITION EU0040-003 and EU0050-004

10 CSR 10-6.260

Restriction of Emission of Sulfur Compounds

Emission Limitation

1. No person shall cause or permit emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three hour time period
2. No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO ₂)	0.03 parts per million (ppm) (80 micrograms per cubic meter (µg/m ³))	Annual arithmetic mean
	0.14 ppm (365 µg/m ³)	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 µg/m ³)	3-hour average not to be exceeded more than once per year
Hydrogen Sulfide (H ₂ S)	0.05 ppm (70 µg/m ³)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 µg/m ³)	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H ₂ SO ₄)	10 µg/m ³	24-hour average not to be exceeded more than once in any 90 consecutive days

Operational Limitation/Equipment Specifications

The emission unit shall be limited to burning wood shavings

Monitoring

1. Compliance to the emission limitations shall be determined by source testing. The heating value of the fuel shall be determined as specified in 10 CSR 10-6.040(2). Source testing to determine compliance shall be performed as specified in 10 CSR 10-6.030(6). The actual heat input shall be determined by multiplying the heating value of the fuel by the amount of fuel burned during the source test period.
2. Other methods approved by the permitting agency in advance may be used to verify compliance.

Recordkeeping

1. The permittee shall maintain records on the premises of all source testing performed.
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting

1. 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 days after any exceedance of the emission limit or sulfur content limit established by 10 CSR 10-6.260, or any malfunction which causes an exceedance.
2. The permittee shall report any deviations from the standards, monitoring/testing, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit

PERMIT CONDITION EU0040-004 and EU0050-005

10 CSR 10-6.405

Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating

Emission Limitation

1. The permittee shall not emit particulate matter in excess of 0.60 pounds per million BTU of heat input from EU0050.
2. The permittee shall not emit particulate matter in excess of 0.60 pounds per million BTU of heat input from EU0040.

Monitoring/Recordkeeping

1. The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule. These calculations are shown on Attachment E.
2. Attachment E shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. Records must be kept on-site for a period of five (5) years

Reporting

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - b) Yard waste, with the following exceptions:
 - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 - iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - (4) In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which

- the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the department Director; and
- iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
 - 3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
 - 4) Ames True Temper, Inc. may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Ames True Temper, Inc. fails to comply with the provisions or any condition of the open burning permit.
 - a) In a nonattainment area, as defined in 10 CSR 10-6.020, Paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
 - 5) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
 - 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

10 CSR 10-6.080 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 10-6.110 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 pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 6) 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.
- 7) 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.
- 8) 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

Emission Limitation:

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

Monitoring:

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
- 2) Should no violation of this regulation be observed during this period then-
 - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - b) If a violation is noted, monitoring reverts to weekly.
 - c) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once per month.
 - ii) If a violation is noted, monitoring reverts to weekly.
- 3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.165 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. This odor evaluation shall be taken at a location outside of the installation's property boundary.

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee must maintain the following monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - b) Should the permittee observe no violations of this regulation during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.
 - (2) If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

The permittee shall maintain records of all observation results using Attachment B (or its equivalent), noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;
- 3) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions (see Attachment D), which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all U.S. EPA Method 9 (see Attachment C) opacity tests performed.

Reporting

- 1) 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 days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit condition shall be submitted in the annual compliance certification as required by Section IV of this permit.

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(6)(C)1.B Permit Duration

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

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

- 1) Recordkeeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi-annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit; this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in Paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semi-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(6)(C)1.D Risk Management Plan Under Section 112(r)

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

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

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

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

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

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

the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

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

None

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted 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 EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;

- b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
- c) Whether compliance was continuous or intermittent;
- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
 - a) The applicable requirements are included and specifically identified in this permit, or
 - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
 - a) The provisions of Section 303 of the Act or Section 643.090, RSMo concerning emergency orders,
 - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
 - c) The applicable requirements of the acid rain program,
 - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
 - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

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

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

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

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

- 1) Section 502(b)(10) changes. Changes that, under Section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting or compliance requirements of the permit.
 - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program'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, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;

- b) The permittee must provide written notice of the change to the Air Pollution Control Program'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 notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
- c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
- d) The permit shield shall not apply to these changes.

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

The application utilized in the preparation of this permit was signed by Roy Gibson, Plant 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(6)(E)6 Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) The Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
- c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) 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(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 C

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

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____
 YES NO Signature of Observer

ATTACHMENT E

This attachment may be used to demonstrate compliance with 10 CSR 10-6.405, *Restriction of Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect Heating*

The emission limit for EU0050 (new, i.e. installed after 02/24/71) is 0.60 lbs PM per million BTUs of heat input. The emission limit for EU0040 (existing, i.e. installed before 02/24/71) is 0.60 lbs PM per million BTUs of heat input.

The following table demonstrates compliance with the emission limit:

New Unit						
Emission Unit #	Heat Capacity (MMBtu/hr)	PM Emission Factor (lbs/MMBtu)	Emission Factor Reference	Potential Emission Rate (lb/MMBtu)	Emission Rate Limit (lb/MMBtu)	Unit in Compliance? (Yes/No)
EU0050	7.73	0.40	AP-42 Ch. 1 Table1.6-1	0.40	0.60	Yes

Existing Unit						
Emission Unit #	Heat Capacity (MMBtu/hr)	PM Emission Factor (lbs/MMBtu)	Emission Factor Reference	Potential Emission Rate (lb/MMBtu)	Emission Rate Limit (lb/MMBtu)	Unit in Compliance? (Yes/No)
EU0040	3.2	0.40	AP-42 Ch. 1 Table1.6-1	0.40	0.60	Yes

ATTACHMENT F

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

Column A	Column B	Column C	Column D
Process	Amount of Wood Waste Used (tons)¹	PM₁₀ Emission Factor (lbs/ton)²	PM₁₀ Emissions(tons)³
Lathe Room (EU0020)		0.2	
Saw Line Grinder (EU0010)		0.2	
Boiler (EU0050)		0.40	
Silo System (EU0030)		0.2	
12-Month PM ₁₀ Emissions Total From Previous Month's Worksheet (lbs.) ⁴			
Monthly PM ₁₀ Emissions Total From Previous Year's Worksheet (lbs.) ⁵			
Current 12-Month total PM ₁₀ Emissions (lbs.) ⁶			

¹Total amount of wood waste used during this month.

²PM₁₀ emission factor from FIRE (SCC 30700802) for EP 2, 3, and 5 and AP-42 Ch. 1 Table 1.6-1 for EP4.

³Column D = (Column B) x (Column C) x (1/2000)

⁴Running 12-month total of PM₁₀ emissions.

⁵PM₁₀ Emissions reported for this month in the last calendar year.

⁶Amount reported in ³ plus amount reported in ⁴ minus amount reported in ⁵. Less than 15 tons indicates compliance.

ATTACHMENT G

Table 2 to Subpart JJJJJ of Part 63—Work Practice Standards, Emission Reduction Measures, and Management Practices

As stated in §63.11201, you must comply with the following applicable work practice standards, emission reduction measures, and management practices:

If your boiler is in this subcategory. . .	You must meet the following. . .
Existing or new biomass or oil	Conduct a tune-up of the boiler biennially as specified in §63.11223.

STATEMENT OF BASIS

Permit Reference Documents

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

- 1) Part 70 Operating Permit Application, received April 8, 2011.
- 2) 2010 year Emissions Inventory Questionnaire, received date March 9, 2011; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4) webFIRE
- 5) Construction Permit #1297-005
- 6) No Permit Required Determination Project #1998-03-101
- 7) Construction Permit #0399-007
- 8) No Permit Required Determination Project #1999-02-042
- 9) Construction Permit # 062000-024
- 10) No Permit Required Determination Project # 2000-07-020
- 11) Construction Permit #022005-005
- 12) No Permit Required Determination Project #2005-10-041

Equipment Removed

The single line and four line pultrusion machines (EP9 and EP11) were removed from the site in 2007. With their removal the installation is no longer a major source of HAP. The voluntary HAP limitation from OP2006-075 is not included in this permit because the installation's potential to emit is below ten (10) tons per year of any individual HAP and below twenty five (25) tons per year of any combination of HAPs.

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.

40 CFR Part 63 Subpart JJJJJ *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*

This rule applies to installations that operate an industrial, commercial, or institutional boiler at an area source of HAP. This installation is an area source of HAP and operates two wood fired boilers which are considered existing sources under this rule.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100, *Alternate Emission Limits*

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

Construction Permits

- 1) Construction Permit #1297-005, Issued November 25, 1997
This permit is for the installation of eight Zuckerman Lathes. This construction permit contains no special conditions. The Zuckerman Lathes were removed in 2002 and never replaced.
- 2) No Permit Required Determination Project #1998-03-101, Issued April 24, 1998
This determination was made for the installation of a single-line pultrusion machine (EP-9). A construction permit was not required because actual emissions from the new equipment are less than 200 pounds per year. The equipment was removed in 2007.
- 3) Construction Permit #0399-007, Issued February 23, 1999
This permit is for the installation of a fiberglass round stock line for coating wood handles. This construction permit was superseded by Construction Permit #022005-005.
- 4) No Permit Required Determination Project #1999-02-042, Issued February 18, 1999
This determination was made for the replacement of an existing saw line with a newer saw line. The saw line that was replaced, designated Emission Point EP-1, was rated at 14 tons per hour. The new saw line, now designated EU0010, which was installed, is rated at 1.625 tons per hour. Even though the design rate of the new saw was much smaller than that of the existing one, the new saw was capable of making more simultaneous cuts than the old one. No increase in production of emissions accompanied this changeover. Therefore, no construction permit was required. This process is controlled by cyclone EP3.
- 5) Construction Permit #062000-024, Issued June 19, 2000
This permit is for the addition of a 7.73 MMBtu/hr wood waste boiler (EU0050), sawline grinder (EU0010) and silo system (EU0030) to the existing installation. Raw material is cut on the sawline and scrap blocks are sent to the grinder. These processes are controlled by a cyclone (EP3). The silo is used to collect sawdust which is fed to the 7.73 MMBtu/hr boiler. This construction permit contains special conditions which are applied in Permit Condition (EU0010 through EU0030)-001 and EU0050-001. No emission testing was required for the equipment.
- 6) No Permit Required Determination Project # 2000-07-020, Issued October 2, 2000
This determination was made for the installation of a 5000-gallon capacity polyester resin storage tank (EP-12). A construction permit was not required because the potential VOC emission rates are 0.045 pounds per hour. The polyester resin was used to coat the wood handles. The tank is currently inactive.
- 7) Construction Permit #022005-005, Issued February 2, 2005
This permit is for the modification of the method of operation of two existing fiberglass pultrusion lines. This construction permit contains special conditions which are not included in this permit because the fiberglass pultrusion lines were removed in 2007.
- 8) No Permit Required Determination Project #2005-10-041, Issued December 2, 2005
This determination was for the installation of a dip coating operation and a baghouse. The dip coating was used to coat the tool handles. The installation does not currently have any dip tanks. All of the coatings are water based lacquers and are applied with a flow coat system using above ground reservoirs. The baghouse is placed after an existing cyclone emission control unit (EP11) and the baghouse exhaust is vented into the pattern lathe and profiler room (EU0060) to provide heat.

New Source Performance Standards (NSPS) Applicability

10 CSR 10-6.070, *New Source Performance Regulations*

40 CFR Part 60 Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984*

This subpart applies to storage vessel which has a storage capacity of greater than 19,812 gallons. The largest tank at this installation has a capacity of 5,000 gallons and does not meet the applicability criteria of this subpart; therefore the tank is not subject to this regulation.

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

The boilers at this installation are less than ten MMBtu/hr therefore this rule does not apply.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart QQQQ, *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products*

This rule applies to wood coating operations at major sources of HAP. This installation is not a major source of HAP therefore this rule does not apply

40 CFR Part 63 Subpart QQQQQQ *National Emissions Standards for Hazardous Air Pollutants for Wood Preserving Area Sources*

This rule does not apply because the installation does not operate a wood preserving operation. Wood preserving is defined as the pressure or thermal impregnation of chemicals into wood to provide effective long-term resistance to attack by fungi, bacteria, insects, and marine borers. This installation manufactures wood products.

40 CFR Part 63 Subpart JJ *National Emission Standards for Wood Furniture Manufacturing Operations*

This rule applies to facilities located at major sources of HAP. This installation is not a major source of HAP therefore this rule does not apply.

40 CFR Part 63 Subpart DDDD *National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products*

This rule applies to facilities located at major sources of HAP. This installation is not a major source of HAP therefore this rule does not apply.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units have pre-control emissions that exceed or are equivalent to the major source threshold

Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) ¹
CO	28.8
CO ₂ e	9575.57
HAP	1.86
NO _x	10.56
PM ₁₀	39.53
PM ₂₅	20.64
SO _x	1.2
VOC	0.82

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

The installation is not a major source of any regulated pollutant, but has chosen to be issued a Part 70 permit. The installation indicated there is a possibility they will add pultrusion lines again in which case they would have to apply for a construction permit.

Other Regulatory Determinations

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

The following units are exempt from this regulation as shown in the following table:

EIQ Point	Description	Explanation
EU0010	Saw line consisting of 3 equalizer saws, 2 trim saws, and 1 grinder Controlled by cyclone at EP-3.	10 CSR 10-6.400(1)(B)12 Cyclone has been included in PTE calculations per Construction Permit# 062000-024, Special Condition 2A
EU0020	Lathe Room consisting of 18 lathes, 2 equalizer saws, 2 slot saws, 4 band saws, and 7 sanders. Controlled by cyclones EP6 and EP7	10 CSR 10-6.400(1)(B)12 Cyclones have been included in PTE calculations per Construction Permit# 062000-024, Special Condition 2A
EU0040	Marion Steam Shovel Boiler	10 CSR 10-6.400(1)(B)6
EU0050	AFS Injection Stoker Boiler	10 CSR 10-6.400(1)(B)6
EP5	Sawdust and shavings pile	10 CSR 10-6.400(1)(B)7
EU0030	Silo system controlled by cyclone	10 CSR 10-6.400(1)(B)12 Cyclone has been included in PTE calculations per Construction Permit# 062000-024, Special Condition 2A

The pattern lathe and profile room (EU0060) is not subject to this rule due to having an uncontrolled potential to emit below the PM emission rate limit. The calculation is shown below.

The allowable PM emission limitation for sources having a process weight rate (P) of 30 ton/hr or less:

$$E = 4.1(P)^{0.67}$$

$$Potential\ PM\ Emission\ Rate = P \left(\frac{tons}{hr} \right) \times PM\ emission\ factor \left(\frac{lb}{ton} \right)$$

Emission Unit	P (ton/hr)	PM Emission Factor (lb/ton) ¹	Potential PM Emission Rate (lb/hr)	PM Emission Rate Limit (lb/hr)
EU0060- Pattern Lathe and Profiler Room	4	0.2	0.8	10.4

¹FIRE (SCC 30700802)

The lathe room is controlled by a cyclone which is not included in this calculation.

10 CSR 10-6.360 Control of NO_x Emissions from Electric Generating Units and Non-Electric Generating Boilers

This rule does not apply because the boiler has a maximum design heat input of less than two hundred fifty (250) million British thermal units per hour (MMBtu/hr).

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:

Colin Janssen
Environmental Engineer

CERTIFIED MAIL: 70093410000193530739
RETURN RECEIPT REQUESTED

Mr. Roy Gibson
Ames True Temper, Inc.
206 East Hunts Road
Bernie, MO 63822

Re: Ames True Temper, Inc., 207-0007
Permit Number: **OP2012-024**

Dear Mr. Gibson:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

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 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Colin Janssen at 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:cjk

Enclosures

c: Southeast Regional Office
PAMS File: 2011-04-021