



## 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:** OP2017-032  
**Expiration Date:** APR 04 2022  
**Installation ID:** 091-0046  
**Project Number:** 2015-12-036

**Installation Name and Address**


Armstrong Hardwood Flooring Co., Inc.  
508 West Thornburgh Street  
West Plains, MO 65775  
Howell County


**Parent Company's Name and Address**

Armstrong Flooring Inc.  
2500 Columbia Avenue  
Lancaster, PA 17603

**Installation Description:**

Armstrong Hardwood Flooring Company, Inc., located in West Plains, Missouri, processes and coats lumber to be used as hardwood flooring. The installation is a major source of volatile organic compounds (VOCs), particulate matter and carbon monoxide. The facility has taken a voluntary limit to remain an area source of hazardous air pollutants (HAPs). The installation is located in Howell County and is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2.

  
Prepared by  
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Operating Permit Unit

  
Director or Designee  
Department of Natural Resources

APR 04 2017

Effective Date

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## I. Installation Equipment Listing

### EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation that emits air pollutants and that are identified as having unit-specific emission limitations. These units are also subject to all plant wide limitations.

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EP-01	#1 Pnuema-Fill Baghouse Vents – Flooring Mill
EP-02	#2 Pnuema-Fill Baghouse Vents – Flooring Mill
EP-03	#3 Pnuema-Fill Baghouse Vents – Flooring Mill
EP-04	Boiler Fuel Metering System - #4 Pnuema-Fill Baghouse
EP-05	350 HP Boiler – Wood Fired
EP-06	1000 HP Boiler – Wood Fired
EP-07	150 HP Boiler – Wood Fired
EP-08	Wood Silo Loadout Area
EP-09	Stain Coater
EP-09 II	Stain Coater
EP-10	Stain Oven
EP-10 II	Stain Oven

### EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance. These units are also subject to all plant wide limitations.

<u>Description of Emission Source</u>	
EP-19	Haul Road
EP-21	Diesel Tank – Working Loss
EP-21 II	Diesel Tank – Breathing Loss

## 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. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Specific Limitations.

### **PERMIT CONDITION PW1**

10 CSR 10-6.065 Operating Permits and/or  
10 CSR 10-6.065(6)(C)2.A Voluntary Permit Limitation

#### **Emission Limitation:**

- 1) The permittee shall emit less than ten tons of any individual hazardous air pollutant (HAP) into the atmosphere from the entire installation during any consecutive 12-month period.
- 2) The permittee shall discharge less than 25 tons of hazardous air pollutants (HAPs) in aggregate into the atmosphere from the entire installation during any consecutive 12-month period

#### **Monitoring/Recordkeeping:**

- 1) The permittee shall maintain on file material safety data sheets or other data sufficient to document the percent HAP constituents in the materials used.
- 2) The permittee shall use Attachments H and I or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program to demonstrate compliance with Emission Limitation 1 and 2.
- 3) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

#### **Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 2) 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 Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

### 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.

<b>PERMIT CONDITION 001</b>			
10 CSR 10-6.060 Construction Permits Required Construction Permit 0688-003A, Issued June 28, 2004			
Emission Unit	Description	Control Device Number	Control Device
EP-01	#1 Pnuema-Fill Baghouse Vents – Flooring Mill, Installed in 1988	CD-01	Fabric Filter/Baghouse
EP-02	#2 Pnuema-Fill Baghouse Vents – Flooring Mill, Installed in 1988	CD-02	Fabric Filter/Baghouse
EP-03	#3 Pnuema-Fill Baghouse Vents – Flooring Mill, Installed in 1988	CD-03	Fabric Filter/Baghouse
EP-04	Boiler Fuel Metering System - #4 Pnuema-Fill Baghouse, Installed in 1987	CD-01	Fabric Filter/Baghouse

**Emission Limitations/Equipment Specifications:**

- 1) The permittee shall control particulate emissions at all times from the flooring mill using baghouses while the flooring mill is in operating. [Special Condition 3(A)]
- 2) The permittee shall operate and maintain the baghouses in accordance with the manufacturer’s specifications. [Special Condition 3(A)]
- 3) The permittee shall equip the baghouse with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources’ employees may easily observe them. [Special Condition 3(A)]
- 4) The permittee shall keep replacement filters for the baghouses and drum filters on hand at all times and be made of fibers appropriate for the operating conditions that are expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Special Condition 3(A)]
- 5) The permittee shall maintain the operating pressure drop across the baghouses and drum filters within the design conditions specified by the manufacturer’s performance warranty. [Special Condition 3(B)]

**Monitoring:**

The permittee shall monitor and record the operating pressure drop across the baghouses (and drum filters) at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Special Condition 3(B)]

**Recordkeeping:**

- 1) The permittee shall retain records of the daily pressure drop readings when in operation. [Special Condition 3(C)]
- 2) The permittee shall maintain an operating and maintenance log for the baghouses and drum filters which shall include the following: [Special Condition 3(C)]

- a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
- b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 3) The permittee shall use Attachments D and E or equivalent forms, such as an electronic form, approved by the Air Pollution Control Program to demonstrate compliance with the filters.
- 4) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**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 Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

<b>PERMIT CONDITION 002</b> 10 CSR 6.405 Restriction of Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect Heating 10 CSR 10-6.060 Construction Permits Required Construction Permit 0688-003A, Issued June 28, 2004			
Emission Unit	Description	Control Device Number	Control Device
EP-05	16.1 mmbtu/hr Wood Fired Boiler 350 HP Installed January 1987 Industrial Boiler Co.	CD-05	Cyclone Flyash Reinjection
EP-06	46 mmbtu/hr Wood Fired Boiler 1000 HP Installed April 1988 Industrial Boiler Co.	CD-06	Cyclone Flyash Reinjection
EP-07	6.9 mmbtu/hr Wood Fired Boiler 150 HP, Installed January 1987 Industrial Boiler Co. vented to Cyclone	NA	Cyclone

**Emission Limitations/Equipment Specifications:**

- 1) The permittee shall not emit particulate matter in excess of 0.31 pounds per million BTU of heat input from each of these units. (§6.405(3)(E))
- 2) The permittee shall use the cyclone system all times whenever boilers EP-05 and EP-06 are in operation to maintain compliance with the standard.
- 3) The permittee shall use the cyclone with flyash reinjection system at all times whenever the 1000 HP boiler is in operation. [Special Condition 5(A)]
- 4) The permittee shall operate and maintain both the cyclone with flyash reinjection system and the cyclone system in accordance with the manufacturer's specifications.

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain an operation and maintenance log for the cyclone which shall include the following: [Special Condition 5(B)]
  - a) Incidents of malfunction; with impact on emissions, duration of event, probable cause, and corrective actions.
  - b) Maintenance activities; with inspection schedule, repair actions, and replacements, etc.

- c) The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule.
- 2) The permittee shall use Attachments D and E or equivalent forms, such as an electronic form, approved by the Air Pollution Control Program to demonstrate compliance with the operation and maintenance recordkeeping requirements.
- 3) The permittee shall use Attachment G as a demonstration that the listed emission units are in compliance with 10 CSR 10-6.405, *Restriction of Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating* when the cyclones are properly operating.
- 4) The permittee shall make these records available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 5) The permittee shall maintain all records for a minimum of five years.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.
- 2) 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 Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

<b>PERMIT CONDITION 003</b>			
10 CSR 10-6.060 Construction Permits Required			
Construction Permit 0688-003A, Issued June 28, 2004			
Emission Unit	Description	Control Device Number	Control Device
EP-05	16.1 mmbtu/hr Wood Fired Boiler 350 HP Installed January 1987 Industrial Boiler Co.	CD-05	Cyclone Flyash Reinjection
EP-06	46 mmbtu/hr Wood Fired Boiler 1000 HP Installed April 1988 Industrial Boiler Co.	CD-06	Cyclone Flyash Reinjection
EP-07	6.9 mmbtu/hr Wood Fired Boiler 150 HP, Installed January 1987 Industrial Boiler Co. vented to Cyclone	NA	Cyclone
EP-09	Cleanup Activities associated with EP-09 II Manufactured by Dubois	NA	None
EP-09 II	Application of stains, sealers and topcoats Manufactured by Dubois	NA	None
EP-10	1.2 mmbtu/hr propane fired drying oven used to dry freshly stained wood Manufactured by Dubois	NA	None
EP-10 II	Coating process, Installed in 1988 Manufactured by Dubois	NA	None



**Emission Limitations:**

- 1) The permittee shall emit less than 250.0 tons of Volatile Organic Compounds (VOCs) combined from EP-06, EP-09, EP-09 II, EP-10, EP-10 II in any consecutive twelve month period. [Special Condition 2(A)]

**Recordkeeping:**

- 1) The permittee shall use Attachment F or an equivalent form, such as an electronic form, approved by the Air Pollution Control Program shall to demonstrate compliance with the emission limitation. [Special Condition 2(B)]
- 2) The permittee shall keep these records on site and they shall be made available to any Department of Natural Resources’ personnel immediately upon request. [Special Condition 2(B)]
- 3) The permittee shall maintain all records for a minimum of five years.

**Reporting:**

- 3) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition. [Special Condition 2(C)]
- 4) 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 Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

<b>PERMIT CONDITION 004</b>			
10 CSR 10-6.400 Restriction of Particulate Matter Emissions From Industrial Processes			
Emission Unit	Description	Control Device Number	Control Device
EP-01	#1 Pnuema-Fill Baghouse Vents – Flooring Mill, Installed in 1988	CD-01	Fabric Filter/Baghouse
EP-02	#2 Pnuema-Fill Baghouse Vents – Flooring Mill, Installed in 1988	CD-02	Fabric Filter/Baghouse
EP-03	#3 Pnuema-Fill Baghouse Vents – Flooring Mill, Installed in 1988	CD-03	Fabric Filter/Baghouse
EP-08	Wood waste storage bin load out within an enclosed building ducted to Baghouse #1 (EP-01), Installed in 1988	CD-01	Fabric Filter/Baghouse

**Operational Requirements:**

- 1) The permittee is provided a conditional exemption on the units listed from this rule per §6.400(1)(B)15.
- 2) The permittee shall maintain the exemption from this rule by complying with the following operation, monitoring and maintenance requirements for the associated control device.

**Equipment and Operation Parameters:**

- 1) The permittee shall use the baghouse system at all times this unit is in operation to maintain the conditional exemption from this rule.

- 2) The permittee shall maintain and operate the baghouses and their respective instrumentation according to the manufacturer's specifications and recommendations.
- 3) The permittee shall not operate these emission units without fabric filters in place in all baghouses that service these emission units.
- 4) The permittee shall maintain the pressure drop across the baghouse filters within the design conditions specified by the manufacturer's performance warranty.
  - a) If the pressure drop falls out of this normal operating range, corrective action shall be taken within eight (8) hours to return the pressure drop to normal.
  - b) If the corrective action cannot be taken within eight (8) hours, the affected baghouse ventilation system will either be shut down, or will be directed such that the emissions from the affected baghouse are vented back into the building.
  - c) A pressure drop reading of less than two (2) inches may be observed for a period following the installation of a new bag.
- 5) The permittee shall keep replacement filters for the baghouse on hand at all times and be made of fibers appropriate for the operating conditions that are expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

**Monitoring:**

- 1) The permittee shall check the baghouse pressure drop daily when units are in operation.
- 2) The permittee shall thoroughly inspect dust collection system/baghouse for leaks and wear semi-annually.
- 3) The permittee shall implement appropriate measures for remediation within eight (8) hours if any leaks or abnormal conditions are detected.

**Recordkeeping:**

- 1) The permittee shall retain records of the daily pressure drop readings.
- 2) The permittee shall maintain records of all inspections of each baghouse.
- 3) The permittee shall maintain records of all fabric filter replacements and maintenance performed.
- 4) The permittee shall use Attachments D and E or equivalent forms, such as an electronic form, approved by the Air Pollution Control Program to certify compliance with these requirements.
- 5) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request.

**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 Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

<b>PERMIT CONDITION 005</b>			
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63 Subpart QQQQ National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products 40 CFR Part 63 Subpart A <i>General Provisions</i>			
Emission Unit	Description	Control Device Number	Control Device
EP-09	Cleanup Activities associated with EP-09 II Manufactured by Dubois	NA	None
EP-09 II	Application of stains, sealers and topcoats, Manufactured by Dubois	NA	None
EP-10	1.2 mmbtu/hr propane fired drying oven used to dry freshly stained wood, Manufactured by Dubois	NA	None
EP-10 II	Coating process, Installed in 1988, Manufactured by Dubois	NA	None

**Emission Limitations:**

- 1) The permittee must limit organic HAP emissions to the atmosphere to no more than 0.78 lb HAP/gal coating solids (93 grams HAP/liter solids). [§63.4690 Table 2]
- 2) The permittee must be in compliance in any coating operation(s) which uses the compliant material option with the applicable emission limit at all times.

**Operating Limits:**

The permittee is not required to meet any operating limits for any coating operation(s) on which the permittee uses the compliant material option or the emission rate without add-on controls option. [§63.4692(a)]

**Work Practice Standards:**

The permittee is not required to meet any work practice standards for any coating operation(s) on which the compliant material option or the emission rate without add-on controls option is used. [§63.4693(a)]

**Demonstrating Continuous Compliance with the Emission Limitations:**

- 1) The permittee must not use any coating for which the organic HAP content determined using Equation 2 of §63.4741 exceeds the applicable emission limit in §63.4690; and use no thinner or cleaning material that contains organic HAP, determined according to §63.4741(a) in order to demonstrate continuous compliance for each compliance period. A compliance period consists of 12 months. Each month after the end of the initial compliance period described in §63.4740 is the end of a compliance period consisting of that month and the preceding 11 months. [§63.4742(a)]
- 2) The permittee chose to comply with the emission limitations by using the compliant material option. The use of any coating, thinner, or cleaning material that does not meet the criteria specified in Paragraph (a) of §63.4742(b) is a deviation from the emission limitations that must be reported as specified in §§63.4710(c)(6) and 63.4720(a)(5). [§63.4742(b)]
- 3) The permittee must identify, as part of each semi-annual compliance report required by §63.4720, the coating operation(s) which used the compliant material option. If there were no deviations from the emission limitations in §63.4690, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because none of the coatings

exceeded the applicable emission limit in §63.4690 for the organic HAP content, and no thinners or cleaning materials that contained organic HAP, determined according to §63.4741(a). [§63.4742(c)] were utilized.

- 4) The permittee must maintain records as specified in §§63.4730 and 63.4731. [§63.4742(d)]

**Monitoring/Recordkeeping:**

- 1) The permittee must collect and keep records of the data and information specified in §63.4730. Failure to collect and keep these records is a deviation from the applicable standard. [§63.4730]  
These records include:
- a) A copy of each notification and report that was submitted to comply with this subpart, and the documentation supporting each notification and report. [§63.4730(a)]
  - b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner, and cleaning material and the volume fraction of coating solids for each coating. If the permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee must keep a copy of the complete test report. If the permittee used information provided by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provided by the manufacturer or supplier. [§63.4730(b)]
  - c) For each compliance period, the records specified in Paragraphs (c)(1) through (4) of §63.4730. [§63.4730(c)]
    - i) A record of the coating operations at which the permittee used each compliance option and the time periods (beginning and ending dates and times) each option was used. [§63.4730(c)(1)]
    - ii) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of §63.4741. [§63.4730(c)(2)]
  - d) A record of the name and volume of each coating, thinner, and cleaning material used during each compliance period. [§63.4730(d)]
  - e) A record of the mass fraction of organic HAP for each coating, thinner, and cleaning material used during each compliance period. [§63.4730(e)]
  - f) A record of the volume fraction of coating solids for each coating used during each compliance period. [§63.4730(f)]
  - g) A record of the density for each coating used during each compliance period; and, if the permittee used either the emission rate without add-on controls or the emission rate with add-on controls compliance option and the density for each thinner and cleaning material used during each compliance period. [§63.4730(g)]
  - h) If the permittee uses an allowance in Equation 1 of §63.4751 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.4751(e)(4), the permittee must keep records of the information specified in Paragraphs (h)(1) through (3) of §63.4730. [§63.4730(h)]
    - i) The name and address of each TSDF to which the permittee sent waste materials for which the permittee uses an allowance in Equation 1 of §63.4751; a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment. [§63.4730(h)(1)]
    - ii) Identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials in Equation 1 of §63.4751. [§63.4730(h)(2)]

- iii) The methodology used in accordance with §63.4751(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment. [§63.4730(h)(3)]
    - iv) The permittee must keep records of the date, time, and duration of each deviation. [§63.4730(j)]
  - 2) The permittee's records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [§63.4731(a)]
  - 3) The permittee must keep each record for a period of five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record as specified in §63.10(b)(1). [§63.4731(b)] The permittee must keep each record on-site for at least two years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The permittee may keep the records off-site for the remaining three years. [§63.4731(c)]

### **Reporting:**

#### ***Semi-annual Compliance Reports***

The permittee must submit semi-annual compliance reports for each affected source according to the requirements of Paragraphs (a)(1) through (7) of §63.4720. The semi-annual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in Paragraph (a)(2) of §63.4720. [§63.4720(a)]

- 1) The permittee must prepare and submit each semi-annual compliance report according to the dates specified in Section V. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [§63.4720(a)(1)]
- 2) *General requirements.* The permittee shall include the information specified in paragraphs (a)(4) through (7) and (c)(1) of §63.4720 that is applicable to the permittees' affected source. The semi-annual compliance report must contain the information specified in Paragraphs (a)(3)(i) through (v) of §63.4720, and the information specified in [§63.4720(a)(3)] as follows:
  - a) Company name and address.
  - b) Statement by a responsible official with that official's name, title and signature, certifying the truth, accuracy and completeness of the content of the report.
  - c) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6- month period ending on June 30 or December 31.
  - d) Identification of the compliance option that the permittee used on each coating operation.
  - e) If the permittee used the emission rate without add-on controls compliance option, the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period.
- 3) The permittee shall include a statement regarding deviations. If there were no deviations from the emission limitations in §§63.4690, 63.4692, and 63.4693 that apply to the permittee, a statement that there were no deviations from the emission limitations during the reporting period must be included in the report. If the permittee used the emission rate with add-on controls option and there were no periods during which the continuous parameter monitoring systems (CPMS) were out-of-control as

- specified in §63.8(c)(7), the semi-annual compliance report must include a statement that there were no periods during which the CPMS were out-of-control during the reporting period. [§63.4720(a)(4)]
- 4) The permittee shall include any deviations when utilizing the Compliant Material Option. As the permittee currently utilizes the compliant material option, if there was a deviation from the applicable emission limit in §63.4690, the semi-annual compliance report must contain the information in Paragraphs (a)(5)(i) through (iv) of §63.4720. [§63.4720(a)(5)] as follows:
    - a) Identification of each coating used that deviated from the emission limit, each thinner and cleaning material used that contained organic HAP, and the dates and time periods each was used.
    - b) The calculation of the organic HAP content (using Equation 2 of §63.4741) for each coating identified in Paragraph (a)(5)(i) of §63.4720. The permittee does not need to submit background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports).
    - c) The determination of mass fraction of organic HAP for each coating, thinner, and cleaning material identified in Paragraph (a)(5)(i) of this section. The permittee does not need to submit background data supporting this calculation (e.g., information provided by material suppliers or manufacturers, or test reports).
    - d) A statement of the cause of each deviation.
  - 5) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records required by this permit condition indicate that the source exceeds the emission limitation of this permit condition.

<b>PERMIT CONDITION 006</b>			
10 CSR 10-6.400 Restriction of Particulate Matter Emissions From Industrial Processes			
Emission Unit	Description	Control Device Number	Control Device
EP-09	Cleanup Activities associated with EP-09 II Manufactured by Dubois	NA	None
EP-09 II	Application of stains, sealers and topcoats Manufactured by Dubois	NA	None
EP-10	1.2 mmbtu/hr propane fired drying oven used to dry freshly stained wood Manufactured by Dubois	NA	None
EP-10 II	Coating process, Installed in 1988 Manufactured by Dubois	NA	None

**Operational Requirements:**

- 1) The permittee is provided a conditional exemption from this rule per §6.400(1)(B)14 on the listed units.
- 2) The permittee shall maintain the exemption from this rule by complying with the following operation, monitoring and maintenance requirements for the associated control device.

**Monitoring:**

- 1) The permittee shall not operate booths equipped with mat/panel filters without a filter in place.

- 2) The permittee shall inspect the filters for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
- 3) The permittee shall inspect the filters each shift before spraying begins in a booth and after installation of a new filter.
- 4) The permittee shall follow the manufacturer’s recommendations with regard to installation and frequency of replacement of the filters.

**Recordkeeping:**

- 1) The permittee shall maintain records of the inspections of mat/panel including when they occur.
- 2) The permittee shall use Attachment D, or an equivalent form approved by the Air Pollution Control Program, must be used to certify compliance with this requirement.
- 3) The permittee shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request.

**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 Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, as required by 10 CSR 10-6.065(5)(C)1.B.

<b>PERMIT CONDITION 007</b>			
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants			
Emission Unit	Description	Control Device Number	Control Device
EP-01	#1 Pnuema-Fill Baghouse Vents – Flooring Mill, Installed in 1988	CD-01	Fabric Filter/Baghouse
EP-02	#2 Pnuema-Fill Baghouse Vents – Flooring Mill, Installed in 1988	CD-02	Fabric Filter/Baghouse
EP-03	#3 Pnuema-Fill Baghouse Vents – Flooring Mill, Installed in 1988	CD-03	Fabric Filter/Baghouse
EP-04	Boiler Fuel Metering System - #4 Pnuema-Fill Baghouse, Installed in 1987	CD-01	Fabric Filter/Baghouse
EP-05	16.1 mmbtu/hr Wood Fired Boiler 350 HP Installed January 1987 Industrial Boiler Co.	CD-05	Cyclone Flyash ReInjection
EP-06	46 mmbtu/hr Wood Fired Boiler 1000 HP Installed April 1988 Industrial Boiler Co.	CD-06	Cyclone Flyash ReInjection
EP-07	6.9 mmbtu/hr Wood Fired Boiler 150 HP, Installed January 1987 Industrial Boiler Co.	NA	None
EP-08	Wood waste storage bin load out within an enclosed building ducted to Baghouse #1 (EP-01), Installed in 1988	CD-01	Fabric Filter/Baghouse

EP-09	Cleanup Activities associated with EP-09 II Manufactured by Dubois	NA	None
EP-09 II	Application of stains, sealers and topcoats, 5,000 square feet of finished flooring per hour Manufactured by Dubois	NA	None
EP-10	1.2 mmbtu/hr propane fired drying oven used to dry freshly stained wood Manufactured by Dubois	NA	None
EP-10 II	Coating process, Installed in 1988 Manufactured by Dubois	NA	None

**Emission Limitation:**

The permittee shall not cause or permit to be discharged into the atmosphere from any source not exempted under 10 CSR 10-6.220 any visible emissions in excess of the 40% limit specified by this rule.

**Monitoring:**

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in USEPA 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) The permittee shall ensure that monitoring frequency will progress in an identical manner from the initial monitoring frequency if the source reverts to weekly monitoring at any time.

**Recordkeeping:**

The permittee shall maintain records of all observation results using Attachments B and C (or equivalent), noting:

- a) Whether any air emissions (except for water vapor) were visible from the emission units;
- b) All emission units from which visible emissions occurred;
- c) Whether the visible emissions were normal for the process;
- d) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- e) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.



<b>PERMIT CONDITION 008</b>			
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 40 CFR Part 63 Subpart A General Provision			
Emission Unit	Description	Control Device Number	Control Device
EP-05	16.1 mmbtu/hr Wood Fired Boiler 350 HP Installed January 1987 Industrial Boiler Co.	CD-05	Cyclone Flyash Reinjection
EP-06	46 mmbtu/hr Wood Fired Boiler 1000 HP Installed April 1988 Industrial Boiler Co.	CD-06	Cyclone Flyash Reinjection
EP-07	6.9 mmbtu/hr Wood Fired Boiler 150 HP, Installed January 1987 Industrial Boiler Co.	NA	None

**Operational Limitations:**

- 1) The permittee shall conduct an initial tune-up as specified in §63.11214, and conduct a tune-up of the boiler biennially as specified in §63.11223
- 2) The permittee must conduct a performance tune-up and keep records as required in §63.11225(c) to demonstrate continuous compliance. The permittee must conduct the tune-up while burning the type of fuel (or fuels in the case of boilers that routinely burn two types of fuels at the same time) that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. [§63.11223]
  - a) The permittee must conduct a tune-up of the boiler biennially to demonstrate continuous. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. For a new or reconstructed boiler, the first biennial tune-up must be no later than 25 months after the initial startup of the new or reconstructed boiler.
    - i) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.
    - ii) 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.
    - iii) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection.
    - iv) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.

- v) Measure the concentrations in the effluent stream of CO 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). Measurements may be taken using a portable CO analyzer.
- vi) Maintain on-site and submit, if requested by the Director, a report containing the following information:
  - (1) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
  - (2) A description of any corrective actions taken as a part of the tune-up of the boiler.
  - (3) The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.
  - (4) If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

**Recordkeeping:**

- 1) The permittee must prepare and submit biennially to the delegated authority upon request, a compliance certification report for the previous calendar years containing the information below. The permittee must submit the report by March 15 if there were any instances of deviations from the applicable requirements during the reporting period.
  - a) Company name and address.
  - b) Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and statement of whether the source has complied with all the relevant standards and other requirements of this subpart. The permittee's notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
    - (1) This facility complies with the requirements in §63.11223 to conduct a biennial tune-up of each boiler.
    - (2) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."
    - (3) This facility complies with the requirement in §§63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available.
- 2) If the permittee experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
- 3) The permittee shall maintain the following records
  - a) 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
  - b) The permittee must keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 and §63.11223 as specified below:

- i) 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.
  - ii) For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to §241.3(b)(1) of this chapter, you must keep a record which documents how the secondary material meets each of the legitimacy criteria under §241.3(d)(1). If you combust a fuel that has been processed from a discarded non-hazardous secondary material pursuant to §241.3(b)(4) of this chapter, you must keep records as to how the operations that produced the fuel satisfies the definition of processing in §241.2 and each of the legitimacy criteria in §241.3(d)(1) of this chapter. If the fuel received a non-waste determination pursuant to the petition process submitted under §241.3(c) of this chapter, you must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary materials as fuel per §241.4, you must keep records documenting that the material is a listed non-waste under §241.4(a).
  - iii) For each boiler required to conduct an energy assessment, you must keep a copy of the energy assessment report.
  - iv) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
  - v) 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.
  - vi) The permittee must keep the records of all inspection and monitoring data required by §§63.11221 and 63.11222, and the information identified below for each required inspection or monitoring.
    - (1) The date, place, and time of the monitoring event.
    - (2) Person conducting the monitoring.
    - (3) Technique or method used.
    - (4) Operating conditions during the activity.
    - (5) Results, including the date, time, and duration of the period from the time the monitoring indicated a problem to the time that monitoring indicated proper operation.
    - (6) Maintenance or corrective action taken (if applicable).
- 4) The permittee's records must be in a form suitable and readily available for expeditious review. The permittee must keep each record for 5 years following the date of each recorded action. The permittee must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The permittee may keep the records off site for the remaining 3 years.
- 5) If the permittee switches fuels or makes a physical change to the boiler(s) and the fuel switch or change resulted in the applicability of a different subcategory within subpart JJJJJ, in the boiler becoming subject to subpart JJJJJ, or in the boiler switching out of subpart JJJJJ due to a change to 100 percent natural gas, or if the permittee has taken a permit limit that resulted in the permittee being subject to subpart JJJJJ, the permittee must provide notice of the date upon which the permittee switched fuels, made the physical change, or took a permit limit within 30 days of the change. The notification must identify:
- a) The name of the owner or operator of the affected source, the location of the source, the boiler(s) that have switched fuels, were physically changed, or took a permit limit, and the date of the notice.

b) The date upon which the fuel switch, physical change, or permit limit occurred.

**Reporting:**

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, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102

<b>PERMIT CONDITION 009</b>			
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds 10 CSR 10-6.261 Control of Sulfur Dioxide Emissions			
Emission Unit	Description	Control Device Number	Control Device
EP-05	16.1 mmbtu/hr Wood Fired Boiler 350 HP Installed January 1987 Industrial Boiler Co.	CD-05	Cyclone Flyash Reinjection
EP-06	46 mmbtu/hr Wood Fired Boiler 1000 HP Installed April 1988 Industrial Boiler Co.	CD-06	Cyclone Flyash Reinjection
EP-07	6.9 mmbtu/hr Wood Fired Boiler 150 HP, Installed January 1987 Industrial Boiler Co.	NA	None

**Emission Limitations:**

- 1) The permittee must limit the SO<sub>2</sub> emissions to less than 2,000 parts per million by volume (2000 ppmv) of sulfur dioxide or no more than 70 milligrams per cubic meter (70 mg/cubic meter) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour period. [10 CSR 10-6.261(3)(A)2]
- 2) The permittee's maximum allowable emission rate per 10 CSR 10-6.260(B)2A and 10 CSR 10-6.261(3)(B)1 sources must limit their SO<sub>2</sub> emissions to less than 8 lbs/mmbtu averaged over a three hour period.

**Monitoring, Recordkeeping and Reporting**

None see Statement of Basis

## 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) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) 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 10-6.165 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 10-6.170**

**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 equipment malfunctions contributed to an exceedance.
- 3) 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 10-6.250 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.

#### **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.

#### **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 record keeping 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*

## 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 Record Keeping and Reporting Requirements**

- 1) Record Keeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) 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, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
  - d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
    - ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.

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

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

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

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

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

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

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

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

permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

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

None

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and 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, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, 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), record keeping, 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, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. 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)34 Responsible Official**

The application utilized in the preparation of this permit was signed by John Ames, Environment, Health and Safety 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) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
  - a) The permit has a remaining term of less than three years;
  - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
  - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

This permit is accompanied by a statement setting forth the legal and factual basis for the 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**  
**Opacity Emissions Observations**

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 G**  
 10 CSR 10-6.405 Compliance Determination

This attachment may be used to demonstrate that the listed emission units are in compliance with 10 CSR 10-6.405, *Restriction of Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*.

Allowable PM emission limitation for new (*post-1971*) indirect heating source having an intermediate capacity between 10 MMBtu and 2,000 MMBtu:

$$E = 1.31(Q)^{-0.338}$$

$$E = 1.31(69)^{-0.338} = 0.31 \text{ lb/MMBtu}$$

Where:

E = the maximum allowable particulate emission rate limit for new sources in pounds per MMBtu of heat input, rounded off to two (2) decimal places.

Q = the summation of heat input in MMBtu /hr from all affected fuel burning equipment at a source (including existing equipment, new equipment, NSPS units, and other clean units).

Installation's Total Heat Input (Q) in MMBtu/hr:

<b>Emission Unit</b>	<b>MHDR (MMBtu/hr)</b>
EP-05	16.1
EP-06	46.0
EP-07	6.9
<b>Total Q</b>	<b>69</b>

<b>Emission Unit</b>	<b>MHDR (MMBtu/hr)</b>	<b>Controlled<sup>1</sup> Emission Factor (lb/MMBtu)</b>	<b>Emission Limit (lb/MMBtu)</b>	<b>Controlled PTE<sup>2</sup> (lb/hr)</b>	<b>Emission Limit PTE<sup>3</sup> (lb/hr)</b>	<b>Control Device</b>
EP-05	16.1	0.237	0.31	3.82	4.99	Cyclone with flyash reinjection
EP-06	46.0	0.237	0.31	10.90	14.26	Cyclone with flyash reinjection
EP-07	6.9	0.237	0.31	1.64	2.14	Cyclone

<sup>1</sup>Total PM Emission Factor derived from the summation of the filterable and condensable emission factors given in US EPA Factors Information Retrieval System (WebFIRE) for SCC 10200908. The filterable portion chosen for this demonstration is a controlled emission factor utilizing a mechanical collector.

<sup>2</sup>The Controlled Potential to Emit is calculated by multiplying the MHDR by the Controlled Emission Factor.

<sup>3</sup>The Emission Limit Potential to Emit is calculated by multiplying the MHDR by the Emission Limit. As long as the controlled potential to emit is lower than the emission limit potential to emit, and the control devices are properly operated and maintained, the unit is considered in compliance.

The calculations demonstrate that the site wide emissions limit set forth from 10 CSR 10 6.405 are met as long as the control devices are used during operation and properly maintained.







## STATEMENT OF BASIS

### INSTALLATION DESCRIPTION

Armstrong Hardwood Flooring Company, Inc., located in West Plains, Missouri, processes and coats lumber to be used as hardwood flooring. The installation is a major source of volatile organic compounds (VOCs), Nitrogen Oxides (NO<sub>x</sub>) and Carbon Monoxide (CO) and an area source of hazardous air pollutants (HAPs). The installation is located in Howell County and is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2, therefore fugitive emissions are not included in the potential to emit (PTE) calculations.

The installation in West Plains, now identified as Armstrong Flooring Co., Inc. with its parent company of Armstrong Flooring Inc. located in Lancaster, Pennsylvania, has been previously identified as both Cloud Oak Flooring and Bruce Hardwood Floors with the parent company of Triangle Pacific Corporation in Dallas, Texas.

### Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) <sup>1,2,3</sup>
PM <sub>10</sub>	27.11
PM <sub>2.5</sub>	11.91
Sulfur Oxides (SO <sub>x</sub> )	6.29
Nitrogen Oxides (NO <sub>x</sub> )	140.81
Volatile Organic Compounds	251.71
Carbon Monoxide (CO)	128.82
CO <sub>2</sub> e	62.652.82
Hazardous Air Pollutants (HAP's)	10/25 <sup>4</sup>

<sup>1</sup>Each emission unit was evaluated at 8,760 hours of annual operation.

<sup>2</sup>EP-01, EP-02, EP-03, EP-04, EP-05 and EP-06 are required under Permit Condition 001 and Permit Condition 002 to utilize a properly operated and maintained control device during all operations. The PTE calculations were evaluated with the required control devices in operation.

<sup>3</sup>The total calculated emissions were taken from Construction Permit 0688-003A, which had totaled the PTE from EP-09, EP-09 II, EP-10, EP-10 II, and EP-06 to 250 TPY, to which the potential to emit totals for the remaining emission units were added.

<sup>4</sup>The installation is limited by Permit Condition PW1 to:

- ◆ Less than 10 tons of any individual HAPs from the entire installation during any consecutive 12 month period.
- ◆ Less than 25 tons of HAPs in aggregate from the entire installation during any consecutive 12 month period.

**Reported Air Pollutant Emissions, tons per year**

Pollutants	2014	2013	2012	2011	2010
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	8.1554	7.2522	8.8828	6.4183	7.7835
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	6.6809	5.8182	7.3072	0.0000	0.0000
Sulfur Oxides (SO <sub>x</sub> )	1.5825	1.5089	1.5999	1.2190	1.3078
Nitrogen Oxides (NO <sub>x</sub> )	2.9184	2.4126	3.9627	2.1259	2.8694
Volatile Organic Compounds (VOC)	64.2320	73.4639	65.8004	44.6200	37.7196
Carbon Monoxide (CO)	16.6120	13.6148	22.8814	12.0620	16.4804
Hazardous Air Pollutants (HAPs)	1.24	1.24	1.24	1.24	1.24

**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 December 18, 2015; revised March 18, 2016
- 2) 2014 Emissions Inventory Questionnaire, received May 1, 2015; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4) Part 70 Operating Permit, OP2011-021, Issued May 17, 2011
- 5) Construction Permit 0688-003A, Issued June 28, 2004
- 6) Construction Permit 0688-003, Issued June 13, 1998
- 7) Construction Permit 0187-002, Issued January 21, 1987

**Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits**

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating* was rescinded on October 30, 2011 and replaced by 10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating* see Permit Condition 002.

**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 Permit History**

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

Construction Permit 0187-002, Issued January 21, 1987

- ◆ This permit was superseded by Construction Permit 0688-003. Therefore, the special conditions are not included in this operating permit.

Construction Permit 0688-003, Issued June 13, 1998

- ◆ This permit was superseded by Construction Permit 0688-003A. Therefore, the special conditions are not included in this operating permit.

No Construction Permit Required Determination, Issued October 15, 2003:

- ◆ This no construction permit required determination is for rough end expansion project.

Construction Permit 0688-003A, Issued June 28, 2004

- ◆ This construction permit clarified special conditions from Construction Permit 0688-003 for flooring mill and the 1000 HP boiler.
- ◆ Special Condition 2, 3 and 5 are included in this operating permit.

No Construction Permit Required Determination, Issued August 30, 2004:

- ◆ This no construction permit required determination is for plaining and dust collection.

No Construction Permit Required Determination, Issued March 25, 2010:

- ◆ This no construction permit required determination is for the modification of a sander.

No Construction Permit Required Determination, Issued August 22, 2012:

- ◆ This no construction permit required determination is for the installation of shaping equipment.

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

Currently, there are no 40 CFR Part 60 subparts that apply to any of the emission units covered by this permit.

- 1) 40 CFR Part 60 Subparts D, *Standards of Performance for Fossil-Fuel-Fired Steam Generators for which Construction Commenced after August 17, 1971*, Da, *Standards of Performance for Electric Utility Steam Generating Units for which Construction is Commenced after September 18, 1978*, Db, *Standards of performance for Industrial-Commercial-Institutional Steam Generating Units*, Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, do not apply to any of the combustion units at this installation since all of the units are all less than 100 MMBtu/hr and all were constructed prior to June 9, 1989.
- 2) 40 CFR Part 60 Subparts K, *Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction or Modification Commenced After June 11, 1973 and Prior to May 19, 1978*, Ka, *Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction or Modification Commenced After May 18, 1978 and Prior to July 23, 1984* and 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*, do not apply to any of the storage tanks at this installation since all storage tanks at the installation have capacities of less than 10,000 gallons.

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

- 1) 40 CFR Part 63 Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*, does not apply to the maintenance parts washers on-site because the cleaning solvent does not meet the definition of a halogenated solvent.
- 2) 40 CFR Part 63 Subpart JJ, *National Emission Standards for Wood Furniture Manufacturing Operations*, does not apply to the operations at the installation since the SIC code of the installation (2426) is not one of those covered by the rule.
- 3) 40 CFR Part 63 Subpart QQQQ *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products*. This standard is applicable to surface coating of wood building products, which means the application of coatings using, for example, roll coaters or curtain coaters in the finishing or laminating of any wood building product that contains more than 50 percent by weight wood or wood fiber excluding the weight of any glass components, and is used in the construction, either interior or exterior, of a residential, commercial, or institutional building. One such subcategory is flooring. [§63.4681] This rule is applicable to the installation as part of the manufacturing process is the staining and coating of the wood flooring. See Permit Condition 005.
- 4) 40 CFR Part 63 Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Industrial/Commercial/Institutional Boilers and Process Heaters*, does not apply to this installation as this is not a major source of HAPs.
- 5) 40 CFR Part 63 Subpart JJJJJ- *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources* does apply to all three of the boilers, which meet the definition of existing biomass boilers in this regulation. See Permit Condition 008

### **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.

### **Greenhouse Gas Emissions**

There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO<sub>2</sub>e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO<sub>2</sub>e emissions were not included within this permit.

### **Other Regulatory Determinations**

- 1) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*; and  
10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

This regulation was marked as applicable in the application. On November 30, 2015 this regulation was rescinded and replaced with 10 CSR 10-6.261, Control of Sulfur Dioxide Emissions. However, 6.260 is still contained in the State Implementation Plan (SIP) and will continue to be an applicable requirement until removed from the SIP. The applicability of these rules is detailed below:

AP-42 Table 1.6-2 (09/03) provides a SO<sub>2</sub> emission factor of 0.025 lb/MMBtu. The standard for SO<sub>2</sub> from indirect heating sources from §6.260(3)(C)(2)(A) is 8 lb/MMBtu. It can be further demonstrated that the SO<sub>2</sub> emissions resulting from the combustion of wood/wood residue does not exceed the new source standard of 500 ppm found in 6.260(3)(A)(2);

$$\text{ppmv SO}_2 = \left( \frac{0.025 \text{ lb}}{\text{MMBtu}} \right) \times \left( \frac{\text{MMBtu}}{10,320 \text{ wscf}} \right) \times \left( \frac{\text{ppmw}}{1.667\text{E}^{-7} \text{ lb/scf}} \right) \times \left( \frac{0.45 \text{ ppmw}}{\text{ppmw}} \right) = 6.54 \text{ ppmv}$$

AP-42 Table 1.6-2 (09/03) provides a SO<sub>2</sub> emission factor of 0.025 lb/MMBtu. The emission limit for SO<sub>2</sub> from indirect heating sources greater than three hundred fifty thousand British thermal units (350,000 Btus) from §6.261(3)(B)(1) is 8 lb/MMBtu of SO<sub>2</sub> per million Btus actual heat input averaged on any consecutive three (3) hour time period. It can be further demonstrated that the SO<sub>2</sub> emissions resulting from the combustion of wood/wood residue does not exceed the emission limitation of the rule by calculating the maximum emission of SO<sub>2</sub> per hour from all boilers combined.

$$\text{lb/hr SO}_2 = \left( \frac{0.025 \text{ lb}}{\text{MMBtu}} \right) \times \left( \frac{69 \text{ MMBtu}}{\text{hr}} \right) = 1.725 \text{ lb/hr}$$

There is no emission factor for sulfur trioxide (SO<sub>3</sub>) in AP-42, but based upon the expected emission rate of SO<sub>2</sub>, it can be reasonably surmised that the emission rate of SO<sub>3</sub> would be minimal. Based on this, it is highly unlikely that the boilers will exceed the emission limitations of the rule. Therefore, no monitoring or recordkeeping is required. See Permit Condition 009

EP 10 & EP-10 II is a propane fired direct heating source. 10 CSR 10-6.260 does not apply because of the fuel combusted per §6.260(1)(A)(2). 10 CSR 10-6.261 does not apply because of the fuel combusted per §6.261(1)(A), liquefied petroleum gas is exempt.

2) 10 CSR 10-6.400, *Control of Emission of Particulate Matter From Industrial Processes.*

The following table provides the allowable particulate emission rate based on 10 CSR 10-6.400 and the potential (maximum) emission rate including particulate emission control equipment. Potentials to emit (PTE) presented below were calculated based on each sources maximum hourly design rates (MHDR).

Table 1 indicates that EP-04 can meet the allowable hourly mass emission limit without considering controls, therefore this rule does not apply to EP-04. EP-01, EP-02, EP-03 and EP-08 cannot meet the allowable hourly mass emission limit without considering controls. Therefore, pressure drop monitoring was included as an applicable requirement in the operating permit for all of these emission units.

For Table 1: Potential to Emit:

$$Uncontrolled\ PTE\left(\frac{lb}{hr}\right) = MHDR\left(\frac{tons}{hr}\right) \times Emission\ Factor\left(\frac{lb}{ton}\right)$$

$$Controlled\ PTE\left(\frac{lb}{hr}\right) = MHDR\left(\frac{tons}{hr}\right) \times Emission\ Factor\left(\frac{lb}{ton}\right) \times (1 - Control\ Efficiency)$$

Allowable PM Emissions:

For EP-01, EP-02, EP-03 and EP-04, the equation used is for process weight rates of 60,000 pounds per hour (lb/hr) or less:  $E = 4.10P^{0.67}$

For EP-08, the equation used is for process weight rates greater than 60,000 lb/hr:

$$E = 55.0P^{0.11} - 40$$

where:

E = rate of emission in lb/hr; and

P = process weight rate in tons per hour (tons/hr)

Table 1

Emission Point	Maximum Design Rate (tons/hr)	PM Emission Factor <sup>1,2,3</sup> (lb/ton)	Control Device Efficiency (%)	PM Potential Emissions (lbs/hr)		PM Allowable Emission Rate (lb/hr)
				Uncontrolled	Controlled	
EP-01	4.89	2.25 <sup>1</sup>	99.00	11.00	0.11	11.87
EP-02	4.75	2.25 <sup>1</sup>	99.00	10.69	0.11	11.65
EP-03	8.15	2.25 <sup>1</sup>	99.00	18.34	0.18	16.72
EP-04	2.67	2.25 <sup>1</sup>	99.00	6.00	0.06	7.92
EP-08	150	2.0 <sup>2</sup>	99.00	300	3.00	55.44

<sup>1</sup> Webfire – SCC 30700805

<sup>2</sup> Webfire – SCC 30703002

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

This rule provides conditional exemptions that will be met by operation, monitoring, and maintenance procedures of the associated control devices as required in Permit Conditions 1, 2, & 6 of this permit.

- 1) §6.400(1)(B)8 - Emission sources that are exempt from construction permitting under 10 CSR 10-6.061;
- 2) §6.400(1)(B)15 - Any particulate matter emission unit that is subject to a federally enforceable requirement to install, operate, and maintain a particulate matter control device system that controls at least ninety percent (90%) of particulate matter emissions;
- 3) §6.400(1)(B)14. Coating operations equipped with a control system designed to control at least ninety-five percent (95%) of the particulate overspray provided the system is operated and maintained in accordance with manufacturers' specifications or comparable maintenance procedures that meet or exceed manufacturers' specifications;

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

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

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

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



## Response to Public Comments

On December 21, 2016 we received five comments from Mr. Mark A. Smith, Air Permitting and Compliance Branch, U.S. EPA's Region VII office in Lenexa, Kansas. The comments are addressed in the order in which they appear within the letter(s).

**Comment #1:** Permit Condition 001 incorporates applicable special conditions from Permit to Construct #06898-003A issued to Bruce Hardwood Floors on June 28, 2004. Emission limitation/equipment specification 1) requires the permittee to control particulate emissions from flooring mill (singular) using baghouses (plural), as specified in the **permit application** (emphasis added). However, this emission limitation/equipment specification, as written, is not enforceable as a practical matter. The application for authority to operate, submitted by the permittee and received by MDNR on December 18, 2015, does not appear to include any baghouse specifications. Therefore, the permit application referenced is apparently the application for permit to construct #0688-003A. The referenced permit application is not attached to this operating permit and is not likely to be available during any regulatory inspection. Therefore, EPA strongly recommends MDNR provide the specific baghouse requirements within Permit Condition 001 to allow for practicable enforceability.

**Response to Comment:** Corrected

**Comment #2:** It appears that the pressure drop across the baghouses is a critical measurement parameter to verify proper operation, of the baghouses, in maintaining control of particulate emissions. The monitoring requirement, currently included in Permit Condition 001, is for the permittee to check the baghouse pressure drop **at least once** (emphasis added) every 24 hours while in operation. If pressure drop is a critical operating parameter, it would appear to the EPA that "once every 24 hours while in operation" does not reflect the degree of importance. Also, pressure drop is a parameter which lends itself to a continuous monitoring scheme. Therefore, EPA strongly recommends Armstrong Flooring install, operate, maintain and calibrate continuous pressure drop monitoring across the baghouses used for particulate emission control from their flooring mills.

**Response to Comment:** The baghouses are not critical to maintain compliance with the PM<sub>10</sub> limits, so the monitoring required once every 24 hours is sufficient for operating purposes. The calculations for the limits and reasoning for requiring the baghouses is included in the Statement of Basis on pages SB-5 and SB-6. I also updated the wording in the permit condition to state that "The permittee shall monitor and record the operating pressure drop across the baghouses (and drum filters) at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty."

**Comment #3:** Permit Condition 005 incorporates applicable requirements from 40 CFR part 63, Subpart QQQQ-National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products. 40 CFR part 63, Subpart QQQQ provide three (3) compliance options for the permittee and, based on review of Permit Condition 005, EPA concludes Armstrong Flooring has elected to follow the "compliant material option." However, requirement 2) in the Demonstrating continuous compliance with emission limitations section, and reporting requirement 4) both indicate "if the permittee chooses" and "if the permittee is utilizing" the compliant material option as descriptions to these two (2) requirements. EPA recommends MDNR modify the language in Permit Condition 005 to reflect the fact that

Armstrong Flooring is using the compliant material option to verify their compliance with emission limits.

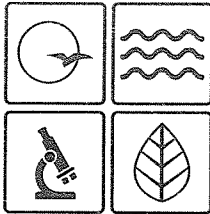
**Response to Comment:** Corrected

**Comment #4:** Permit Condition 008 incorporates applicable requirements from 40 CFR part 63, Subpart JJJJJ National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers: Area Sources. It is EPA's understanding that MDNR relies on the EPA for compliance management for area sources subject to 40 CFR part 63, Subpart JJJJJ. Therefore, all compliance related reports shall be submitted to the Missouri Air Compliance Coordinator at Region 7, with copies to MDNR, as necessary. MDNR should modify the reporting requirement in Permit Condition 008 to reflect this reporting scenario.

**Response to Comment:** Corrected

**Comment #5:** The installation in West Plains, now identified as Armstrong Flooring Co., Inc. with its parent company of Armstrong Flooring Inc. located in Lancaster, Pennsylvania, has been previously identified as both Cloud Oak Flooring and Bruce Hardwood Floors with the parent company of Triangle Pacific Corporation in Dallas, Texas. EPA considers this ownership information as pertinent to the review of the operating permit and suggests MDNR add the installation ownership history to the Installation Description in the Statement of Basis.

**Response to Comment:** History of facility has been added to the Statement of Basis.



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

APR 04 2017

Mr. John Ames  
Armstrong Hardwood Flooring Co., Inc.  
P.O. Box 929  
West Plains, MO 65775

Re: Armstrong Hardwood Flooring Co., Inc., 091-0046  
Permit Number: OP2017-032

Dear Mr. Ames:

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.

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

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty 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 contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:kbj

Enclosures

c: PAMS File: 2015-12-036



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