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: OP2018-061
Expiration Date: JUL 31 2023
Installation ID: 157-0020
Project Number: 2018-03-013

Installation Name and Address: Atlas EPS, A Division of Atlas Roofing
911 Industrial Drive
Perryville, MO 63673
Perry County

Parent Company’s Name and Address: Atlas Roofing
802 Hwy 19 North, Suite 190
Meridian, MS 39307

Installation Description:
Atlas EPS, a Division of Atlas Roofing (formerly named NPS Corporation and Falcon Foam), is an expandable polystyrene (EPS) block mold manufacturer and fabricator. The production of EPS molds starts with the pre-expansion of the polystyrene beads by injecting steam provided by one sawdust fired and two natural gas fired boilers. After being dried and allowed to cure in the curing silo, the pre-expanded beads are then fed into a block mold, where the beads are further heated by steam. The heat causes the beads to expand and fill the confines of the mold. The blocks then are allowed to cure before they are cut, grinded, and shipped to the customer. The facility is located in an attainment area for all criteria pollutants, is a major source of VOC, and is not a named source. 40 CFR Part 60, Subpart Dc and 40 CFR Part 63, Subpart JJJJJJ applies to this facility.

Prepared by
Justin Spasovski
Operating Permit Unit

Director or Designee
Department of Natural Resources

JUL 31 2018
Effective Date
# Table of Contents

## I. INSTALLATION EQUIPMENT LISTING .................................................................3

- EMISSION UNITS WITH LIMITATIONS .................................................................3
- EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS ........................................3

## II. PLANT WIDE EMISSION LIMITATIONS .........................................................4

- PERMIT CONDITION PW001
  - 10 CSR 10-6.020(2)(1)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s) ..................4

## III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS .................................5

- PERMIT CONDITION 001
  - 10 CSR 10-6.070 New Source Performance Regulations ..............................................5
  - 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units ..........................................................5

- PERMIT CONDITION 002
  - 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations .......................5

- PERMIT CONDITION 003
  - 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants .......................9

- PERMIT CONDITION 004
  - 10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds ..............................11

- PERMIT CONDITION 005
  - 10 CSR 10-6.261 Control of Sulfur Dioxide Emissions ........................................11

- PERMIT CONDITION 006
  - 10 CSR 10-6.405 Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating .........................................................12

## IV. CORE PERMIT REQUIREMENTS .......................................................................13

## V. GENERAL PERMIT REQUIREMENTS ................................................................19

## VI. ATTACHMENTS .............................................................................................24

- ATTACHMENT A
  - Fugitive Emission Observations .................................................................25
- ATTACHMENT B
  - Method 22 Visible Emissions Observations ................................................26
- ATTACHMENT C
  - Method 9 Opacity Observations .................................................................27
- ATTACHMENT D
  - VOC Compliance Worksheet ........................................................................29
- ATTACHMENT E
  - Methanol HAP Compliance Worksheet ......................................................30
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.

<table>
<thead>
<tr>
<th>Emission Unit #</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-1</td>
<td>Wood Fired Boiler</td>
</tr>
<tr>
<td>EP-10</td>
<td>Sawdust Handling – Bin Vent</td>
</tr>
</tbody>
</table>

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.

<table>
<thead>
<tr>
<th>Emission Unit #</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-2A</td>
<td>Natural Gas Fired Boiler</td>
</tr>
<tr>
<td>EP-2B</td>
<td>Natural Gas Fired Boiler</td>
</tr>
<tr>
<td>EP-3A</td>
<td>Expander</td>
</tr>
<tr>
<td>EP-3B</td>
<td>Expander</td>
</tr>
<tr>
<td>EP-4A</td>
<td>Bag Aging</td>
</tr>
<tr>
<td>EP-4B</td>
<td>Bag Aging</td>
</tr>
<tr>
<td>EP-5</td>
<td>Black Mold</td>
</tr>
<tr>
<td>EP-6A</td>
<td>Shape Mold</td>
</tr>
<tr>
<td>EP-6B</td>
<td>Shape Mold</td>
</tr>
<tr>
<td>EP-6C</td>
<td>Shape Mold</td>
</tr>
<tr>
<td>EP-7</td>
<td>Fabrication Lines</td>
</tr>
<tr>
<td>EP-8</td>
<td>Printing</td>
</tr>
<tr>
<td>EP-9A</td>
<td>Haul Road Materials Receiving</td>
</tr>
<tr>
<td>EP-9B</td>
<td>Haul Road Product Shipping</td>
</tr>
<tr>
<td>EP-10</td>
<td>Sawdust Handling – Hopper</td>
</tr>
<tr>
<td>EP-11</td>
<td>Embossing Line</td>
</tr>
</tbody>
</table>
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 Limitations.

PERMIT CONDITION PW001
10 CSR 10-6.020(2)(1)23. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

Emission Limitations:
1) The permittee shall emit less than 250.0 tons of VOCs in any consecutive 12-month period from the entire installation. The permittee shall include the startup, shutdown, and malfunction emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050 in the compliance demonstration.
2) The permittee shall emit less than 10.0 tons of methanol (CAS 67-56-1) in any consecutive 12-month period from the entire installation. The permittee shall include the startup, shutdown, and malfunction emissions as reported to the Air Pollution Control Program's Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050 in the compliance demonstration.

Operational Limitation:
The permittee shall keep the ink solvents and cleaning solutions in sealed containers whenever the materials are not in use. The permittee shall provide and maintain suitable, easily read, permanent markings on all inks, solvent and cleaning solution containers used with this equipment.

Monitoring/Recordkeeping/Reporting:
1) The permittee shall use Attachments D and E or equivalent forms, such as electronic forms, to demonstrate compliance with the emission limitations.
2) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include SDS for all materials used or other materials from the manufacturer indicating the pentane content of each shipment of polystyrene beads.
3) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, by mail at P.O. Box 176, Jefferson City, MO 65102 or by email at aircompliancereporting@dnr.mo.gov, no later than 10 days after the end of the month during which any record required by this permit shows an exceedance of a limitation imposed by this permit.
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.

PERMIT CONDITION 001
10 CSR 10-6.070 New Source Performance Regulations
40 CFR Part 60, Subpart De, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

<table>
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<tr>
<th>Emission Unit</th>
<th>Description</th>
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</table>
| EP-1          | Wood Fired Boiler  
|               | Heat Capacity: 10.04 MMBtu/hr  
|               | Construction Year: 1996 |

Recordkeeping:
1) Except as provided under §60.48c(g)(2) and (g)(3), the permittee shall record and maintain records of the amount of sawdust combusted during each operating day. [§60.48c(g)(1)]
2) As an alternative to meeting the requirements of §60.48c(g)(1), the permittee may elect to record and maintain records of the amount of sawdust combusted during each calendar month. [§60.48c(g)(2)]
3) As an alternative to meeting the requirements of §60.48c(g)(1), the permittee may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month. [§60.48c(g)(3)]
4) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources’ personnel upon request.

Reporting:
The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 002
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

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<th>Description</th>
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</thead>
</table>
| EP-1          | Wood Fired Boiler  
|               | Heat Capacity: 10.04 MMBtu/hr  
|               | Construction Year: 1996 |

Standards:
1) The permittee shall comply with each work practice standard, emission reduction measure, and management practice specified in Table 2 to Subpart JJJJJJ of Part 63 that applies. An energy assessment completed on or after January 1, 2008 that meets or is amended to meet the energy assessment requirements in Table 2 to Subpart JJJJJJ of Part 63 satisfies the energy assessment...
requirement. A facility that operates under an energy management program established through
energy management systems compatible with ISO 50001, that includes the affected units, also
satisfies the energy assessment requirement. [§63.11201(b)]

2) These standards apply at all times the affected boiler is operating, except during periods of startup
and shutdown as defined in §63.11237, during which time the permittee shall comply only with
Table 2 to Subpart JJJJJJ of Part 63. [§63.11201(d)]

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

<table>
<thead>
<tr>
<th>If your boiler is in this subcategory...</th>
<th>You must meet the following...</th>
</tr>
</thead>
</table>
| 6. Existing biomass-fired boilers that
do not meet the definition of seasonal
boiler or limited-use boiler, or use an
oxygen trim system that maintains an
optimum air-to-fuel ratio | Conduct an initial tune-up as specified in §63.11214, and
conduct a tune-up of the boiler biennially as specified in
§63.11223. |
| 16. Existing coal-fired, biomass-fired,
or oil fired boilers (units with heat input
capacity of 10 MMBtu/hr and greater),
not including limited use boilers | Must have a one-time energy assessment performed by a
qualified energy assessor. An energy assessment completed
on or after January 1, 2008, that meets or is amended to meet
the energy assessment requirements in this table satisfies the
energy assessment requirement. Energy assessor approval
and qualification requirements are waived in instances where
past or amended energy assessments are used to meet the
energy assessment requirements. A facility that operated
under an energy management program developed according
to the ENERGY STAR guidelines for energy management or
compatible with ISO 50001 for at least 1 year between
January 1, 2008, and the compliance date specified in
§63.11196 that includes the affected units also satisfies the
energy assessment requirement. The energy assessment must
include the following with extent of the evaluation for items
(1) to (4) appropriate for the on-site technical hours listed in
§63.11237:
(1) A visual inspection of the boiler system,
(2) An evaluation of operating characteristics of the affected
boiler systems, specifications of energy use systems,
operating and maintenance procedures, and unusual
operating constraints,
(3) An inventory of major energy use systems consuming
energy from affected boiler(s) and which are under
control of the boiler owner or operator,
(4) A review of available architectural and engineering
plans, facility operation and maintenance procedures and
logs, and fuel usage,
(5) A list of major energy conservation measures that are
within the facility's control,
(6) A list of the energy savings potential of the energy
conservation measures identified, and |
If your boiler is in this subcategory... | You must meet the following...
---|---
| (7) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

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

**Continuous Compliance:**
1) The permittee shall conduct a performance tune-up according to §63.11223(b) and keep records as required in §63.11225(c) to demonstrate continuous compliance. The permittee shall conduct the tune-up while burning the type of fuel that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. [§63.11223(a)]
2) The permittee shall conduct a tune-up of the boiler biennially to demonstrate continuous compliance as specified in §63.11223(b)(1) through (7). Each biennial tune-up shall be conducted no more than 25 months after the previous tune-up. [§63.11223(b)]
   a) As applicable, the permittee shall 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). [§63.11223(b)(1)]
   b) The permittee shall inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer’s specifications, if available. [§63.11223(b)(2)]
   c) The permittee shall 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). [§63.11223(b)(3)]
   d) The permittee shall 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. [§63.11223(b)(4)]
   e) The permittee shall 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. [§63.11223(b)(5)]
   f) The permittee shall maintain on-site and submit, if requested by the Administrator, a report containing the following information: [§63.11223(b)(6)]
      i) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler. [§63.11223(b)(6)(i)]
ii) A description of any corrective actions taken as a part of the tune-up of the boiler. [§63.11223(b)(6)(ii)]

g) If the unit is not operating on the required date for a tune-up, the tune-up shall be conducted within 30 days of startup. [§63.11223(b)(7)]

General Provisions:
The permittee shall refer to Table 8 of 40 CFR Part 63, Subpart JJJJJJ for 40 CFR Part 63, Subpart A applicability. [§63.11235]

Notifications/Recordkeeping/Reporting:
1) The permittee shall submit the following notifications to the Administrator: [§63.11225(a)]
   a) The permittee shall submit all of the notifications in §§63.7(b); 63.8(e) and (f); and 63.9(b) through (e), (g), and (h) that apply to the boiler by the dates specified in those sections except as specified in §63.11225(a)(4). [§63.11225(a)(1)]

2) The permittee shall prepare, by March 1 of each year, and submit to the Administrator, upon request, an annual compliance certification report for the previous calendar year containing the information specified below. The permittee shall submit the report by March 15 if any instance described by §63.11225(b)(3) occurs. For boilers that are subject only to the energy assessment requirement and/or a requirement to conduct a biennial or 5-year tune-up according to §63.11223(a) and not subject to emission limits or operating limits, the permittee may prepare only a biennial or 5-year compliance report as specified in §63.11225(b)(1) and (2). [§63.11225(b)]
   a) Company name and address. [§63.11225(b)(1)]
   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 a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. The permittee’s notification shall include the following certification(s) of compliance, as applicable, and signed by a responsible official: [§63.11225(b)(2)]
      i) “This facility complies with the requirements in §63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler.” [§63.11225(b)(2)(i)]
      ii) “No secondary materials that are solid waste were combusted in any affected unit.” [§63.11225(b)(2)(ii)]
   c) If the source 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. [§63.11225(b)(3)]

3) The permittee shall maintain the following records: [§63.11225(c)]
   a) As required in §63.10(b)(2)(xiv), the permittee shall keep a copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart JJJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status submitted. [§63.11225(c)(1)]
   b) The permittee shall keep records to document conformance with the work practices, emission reduction measures, and management practices required by §63.11214 and §63.11223 as specified in §63.11225(c)(2)(i) and (iii). [§63.11225(c)(2)]
      i) Records shall identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned. [§63.11225(c)(2)(i)]
      ii) For each boiler required to conduct an energy assessment, the permittee shall keep a copy of the energy assessment report. [§63.11225(c)(2)(iii)]
   c) Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment. [§63.11225(c)(4)]
d) Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation. [§63.11225(c)(5)]

4) The permittee shall keep records in a form suitable and readily available for expeditious review. The permittee shall keep each record for 5 years following the date of each recorded action. The permittee shall 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. [§63.11225(d)]

5) If the permittee has switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within 40 CFR Part 63, Subpart JJJJJJ, in the boiler becoming subject to 40 CFR Part 63, Subpart JJJJJJ, or in the boiler switching out of 40 CFR Part 63, Subpart JJJJJJ due to a fuel change that results in the boiler meeting the definition of gas-fired boiler, as defined in §63.11237, or the permittee has taken a permit limit that resulted in the permittee becoming subject to 40 CFR Part 63, Subpart JJJJJJ or no longer being subject to 40 CFR Part 63, Subpart JJJJJJ, the permittee shall 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: [§63.11225(g)]

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. [§63.11225(g)(1)]

b) The date upon which the fuel switch, physical change, or permit limit occurred. [§63.11225(g)(2)]

6) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

<table>
<thead>
<tr>
<th>PERMIT CONDITION 003</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-1</td>
<td>Wood Fired Boiler</td>
</tr>
<tr>
<td></td>
<td>Heat Capacity: 10.04 MMBtu/hr</td>
</tr>
<tr>
<td></td>
<td>Construction Year: 1996</td>
</tr>
<tr>
<td>EP-10</td>
<td>Sawdust Handling – Bin Vent</td>
</tr>
</tbody>
</table>

**Emission Limitation:**

1) The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent for any continuous six-minute period. [10 CSR 10-6.220(3)(A)1]

2) Exception: The permittee may discharge into the atmosphere from any emission unit visible emissions with an opacity up to 60 percent for one continuous six-minute period in any 60 minutes. [10 CSR 10-6.220(3)(A)2]

3) Failure to demonstrate compliance with 10 CSR 10-6.220(3)(A) solely because of the presence of uncombined water shall not be a violation. [10 CSR 10-6.220(3)(B)]
Monitoring:
1) Monitoring schedule:
   a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:
      i) The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then:
         (1) The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring.
   2) If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the initial monitoring schedule.
   3) Observations are only required when the emission units are operating and when the weather conditions allow.
   4) Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.
   5) The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22. Each Method 22 observation shall be conducted for a minimum of six-minutes. If no visible emissions are observed from the emission unit using Method 22, then no Method 9 is required for the emission unit.
   6) For emission units with visible emissions, the permittee shall have a certified Method 9 observer conduct a U.S. EPA Test Method 9 opacity observation. The permittee may choose to forego Method 22 observations and instead begin with a Method 9 opacity observation. The certified Method 9 observer shall conduct each Method 9 opacity observation for a minimum of 30-minutes.

Record Keeping:
1) The permittee shall maintain records of all observation results for each emission unit using Attachments B and C or equivalent forms.
2) The permittee shall make these records available immediately for inspection to the Department of Natural Resources' personnel upon request.
3) The permittee shall retain all records for five years.

Reporting:
1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after an exceedance of the emission limitation.
2) The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.
PERMIT CONDITION 004
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

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<tbody>
<tr>
<td>EP-1</td>
<td>Wood Fired Boiler</td>
</tr>
<tr>
<td></td>
<td>Heat Capacity: 10.04 MMBtu/hr</td>
</tr>
<tr>
<td></td>
<td>Construction Year: 1996</td>
</tr>
</tbody>
</table>

_Emission Limitation:_
The permittee shall not cause or allow emissions of sulfur dioxides into the atmosphere from the affected unit in excess of eight pounds (8 lbs.) of sulfur dioxides per million Btus actual heat input averaged on any consecutive three (3)-hour time period.

_Monitoring/Recordkeeping/Reporting:_
None, See Statement of Basis

PERMIT CONDITION 005
10 CSR 10-6.261 Control of Sulfur Dioxide Emissions

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<td></td>
<td>Construction Year: 1996</td>
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</tbody>
</table>

_Emission Limitation:_
The permittee shall limit the SO₂ emissions from the affected unit to no more than eight pounds (8 lbs.) of SO₂ per million Btus actual heat input averaged on any consecutive three (3)-hour time period. [6.261(3)(B)1.]

_Monitoring/Recordkeeping/Reporting:_
None, See Statement of Basis

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1 This regulation was rescinded by the State of Missouri on November 30, 2015. The regulation appears in this operating permit as it is contained in Missouri's SIP and is a federal only requirement. This permit condition will no longer be applicable when EPA takes final action to incorporate 10 CSR 10-6.261 in Missouri's SIP in place of 10 CSR 10-6.260. No action is required on the part of the permittee to remove this permit condition from this operating permit upon the removal of 10 CSR 10-6.260 from the Missouri SIP.

2 This regulation has not yet been adopted into Missouri’s SIP; therefore, this regulation is a state only requirement. Upon adoption into Missouri’s SIP, this regulation will be both a state and federal requirement.
**PERMIT CONDITION 006**
10 CSR 10-6.405 Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating

<table>
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<th>Emission Unit</th>
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</table>
| EP-1          | Wood Fired Boiler  
                Heat Capacity: 10.04 MMBtu/hr  
                Construction Year: 1996 |
| EP-2A         | Gas Fired Boiler  
                Heat Capacity: 5.91 MMBtu/hr  
                Construction Year: 2017 |
| EP-2B         | Gas Fired Boiler  
                Heat Capacity: 5.91 MMBtu/hr  
                Construction Year: 2017 |

**Emission Limitation:**
The permittee shall not emit particulate matter in excess of 0.46 pounds per MMBtu of heat input from the Wood Fired Boiler (EP-1).

**Monitoring/Recordkeeping/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 are only excerpts from the regulation or code, and are provided for summary purposes only.

10 CSR 10-6.045 Open Burning Requirements

1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.

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

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

1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
   a) Name and location of installation;
   b) Name and telephone number of person responsible for the installation;
   c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
   d) Identity of the equipment causing the excess emissions;
   e) Time and duration of the period of excess emissions;
   f) Cause of the excess emissions;
   g) Air pollutants involved;
   h) Estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
   i) Measures taken to mitigate the extent and duration of the excess emissions; and
   j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.

2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.

3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

<table>
<thead>
<tr>
<th>10 CSR 10-6.060 Construction Permits Required</th>
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<td>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.</td>
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<thead>
<tr>
<th>10 CSR 10-6.065 Operating Permits</th>
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<tr>
<td>The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.</td>
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<tr>
<td>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.</td>
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<tr>
<th>10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information</th>
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<tr>
<td>1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.</td>
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<tr>
<td>2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.</td>
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<tr>
<td>3) 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.</td>
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<tr>
<th>10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential</th>
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<tr>
<td>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.</td>
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<tr>
<th>10 CSR 10-6.150 Circumvention</th>
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<tbody>
<tr>
<td>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.</td>
</tr>
</tbody>
</table>
**10 CSR 10-6.165 Restriction of Emission of Odors**

This requirement is a State Only permit requirement.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. 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
This is a State Only permit requirement.
The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

10 CSR 10-6.280 Compliance Monitoring Usage
1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Any other monitoring methods approved by the director.
2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
   a) Applicable monitoring or testing methods, cited in:
      i) 10 CSR 10-6.030, “Sampling Methods for Air Pollution Sources”;
      ii) 10 CSR 10-6.040, “Reference Methods”;
      iii) 10 CSR 10-6.070, “New Source Performance Standards”;
      iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”; 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.

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

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
   b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.

2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
   c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
   d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
   e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
   f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.

3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

4) If the permittee performs a service on motor (fleets) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been
completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*
V. General Permit Requirements

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

10 CSR 10-6.065(6)(C)1.B Permit Duration
10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

10 CSR 10-6.065(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 or AirComplianceReporting@dnr.mo.gov.
   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.
   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.

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

10 CSR 10-6.065(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.
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 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 and 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 permit, 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 and 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 Bill Calla, Operations 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.

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<th>10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause</th>
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<td>This permit shall be reopened for cause if:</td>
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<td>1) The Missouri Department of Natural Resources (MoDNR) receives notice from the Environmental</td>
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<tr>
<td>Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d)</td>
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<td>has been granted, provided that the reopening may be stayed pending judicial review of that</td>
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<td>determination,</td>
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<td>2) MoDNR or EPA determines that the permit contains a material mistake or that inaccurate statements</td>
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<td>were made which resulted in establishing the emissions limitation standards or other terms of the</td>
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<td>permit,</td>
</tr>
<tr>
<td>3) Additional applicable requirements under the Act become applicable to the installation; however,</td>
</tr>
<tr>
<td>reopening on this ground is not required if—:</td>
</tr>
<tr>
<td>a) The permit has a remaining term of less than three years;</td>
</tr>
<tr>
<td>b) The effective date of the requirement is later than the date on which the permit is due to expire;</td>
</tr>
<tr>
<td>or</td>
</tr>
<tr>
<td>c) The additional applicable requirements are implemented in a general permit that is applicable to</td>
</tr>
<tr>
<td>the installation and the installation receives authorization for coverage under that general permit,</td>
</tr>
<tr>
<td>4) The installation is an affected source under the acid rain program and additional requirements</td>
</tr>
<tr>
<td>(including excess emissions requirements), become applicable to that source, provided that, upon</td>
</tr>
<tr>
<td>approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit;</td>
</tr>
<tr>
<td>or</td>
</tr>
<tr>
<td>5) MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with</td>
</tr>
<tr>
<td>applicable requirements.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>10 CSR 10-6.065(6)(E)1.C Statement of Basis</th>
</tr>
</thead>
<tbody>
<tr>
<td>This permit is accompanied by a statement setting forth the legal and factual basis for the permit</td>
</tr>
<tr>
<td>conditions (including references to applicable statutory or regulatory provisions). This Statement of</td>
</tr>
<tr>
<td>Basis, while referenced by the permit, is not an actual part of the permit.</td>
</tr>
</tbody>
</table>

VI. Attachments

Attachments follow.
## Attachment A
Fugitive Emission Observations

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Visible Emissions</th>
<th>If There Are Visible Emissions Beyond the Property Boundary</th>
<th>Corrective Action</th>
<th>Initial</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>No</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
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<td></td>
</tr>
</tbody>
</table>
### Method 22 Visible Emissions Observations

<table>
<thead>
<tr>
<th>Installation Name</th>
<th>Observer Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location</td>
<td>Date</td>
</tr>
<tr>
<td>Sky Conditions</td>
<td>Wind Direction</td>
</tr>
<tr>
<td>Precipitation</td>
<td>Wind Speed</td>
</tr>
<tr>
<td>Time</td>
<td>Emission unit</td>
</tr>
</tbody>
</table>

**Sketch emission unit:** indicate observer position relative to emission unit; indicate potential emission points and/or actual emission points.

<table>
<thead>
<tr>
<th>Minute</th>
<th>0</th>
<th>15</th>
<th>30</th>
<th>45</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>0</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If visible emissions are observed, the installation is not required to complete the entire six-minute observation. The installation shall note when the visible emissions were observed and shall conduct a Method 9 opacity observation.
# Method 9 Opacity Observations

<table>
<thead>
<tr>
<th>Installation Name:</th>
<th>Sketch of the observer’s position relative to the emission unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Point:</td>
<td></td>
</tr>
<tr>
<td>Emission Unit:</td>
<td></td>
</tr>
<tr>
<td>Observer Name and Affiliation:</td>
<td></td>
</tr>
<tr>
<td>Observer Certification Date:</td>
<td></td>
</tr>
<tr>
<td>Method 9 Observation Date:</td>
<td></td>
</tr>
<tr>
<td>Height of Emission Point:</td>
<td></td>
</tr>
<tr>
<td>Time:</td>
<td>Start of observations</td>
</tr>
<tr>
<td>Distance of Observer from Emission Point:</td>
<td></td>
</tr>
<tr>
<td>Observer Direction from Emission Point:</td>
<td></td>
</tr>
<tr>
<td>Approximate Wind Direction:</td>
<td></td>
</tr>
<tr>
<td>Estimated Wind Speed:</td>
<td></td>
</tr>
<tr>
<td>Ambient Temperature:</td>
<td></td>
</tr>
<tr>
<td>Description of Sky Conditions (Presence and color of clouds):</td>
<td></td>
</tr>
<tr>
<td>Plume Color:</td>
<td></td>
</tr>
<tr>
<td>Approximate Distance Plume is Visible from Emission Point:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Minute</th>
<th>Seconds</th>
<th>1-minute Avg. % Opacity</th>
<th>6-minute Avg. % Opacity</th>
<th>Steam Plume (check if applicable)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Attached</td>
<td>Detached</td>
</tr>
<tr>
<td>0</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>1</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>10</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

3 1-minute avg. % opacity is the average of the four 15 second opacity readings during the minute.
4 6-minute avg. % opacity is the average of the six most recent 1-minute avg. % opacities.
5 Each 15 second opacity reading shall be recorded to the nearest 5% opacity as stated within Method 9.
The emission unit is in compliance if each six-minute average opacity is less than or equal to 20%.
Exception: The emission unit is in compliance if one six-minute average opacity is greater than 20%, but less than 60%.

Was the emission unit in compliance at the time of evaluation (yes or no)?

Signature of Observer
**Attachment D**

**VOC Compliance Worksheet**

This sheet covers the period from __________ to __________.

(month, year) (month, year)

Copy this sheet as needed

<table>
<thead>
<tr>
<th>Column A</th>
<th>Column B</th>
<th>Column C</th>
<th>Column D</th>
<th>Column E</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Point</td>
<td>Description</td>
<td>Amount Processed (lb/month or gallon/month)</td>
<td>VOC Emission Factor (lb VOC/lb bead or lb VOC/gallon)</td>
<td>VOC Emissions (Note 2) (tons)</td>
</tr>
<tr>
<td>Note 1</td>
<td>EPS Bead Usage</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>EP-1</td>
<td>Wood Fired Boiler</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>EP-8 (Note 3)</td>
<td>#4-63 Blue Ink</td>
<td>(Note 2)</td>
<td>4.34</td>
<td></td>
</tr>
<tr>
<td></td>
<td>#8 Ink Conditioner/Thinner</td>
<td></td>
<td></td>
<td>6.76</td>
</tr>
<tr>
<td><strong>Total VOC Emissions from the Installation for this month (Note 4)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Total VOC Emissions from the previous 11 months (Note 5)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Current 12-Month Total VOC Emissions (Note 6)</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Note 1: EPS Bead Usage includes all beads expanded and shaped at the installation. Specifically, any beads that are expanded using the two Polystyrene Expanders (EP-3A & EP-3B) will need to be tracked in Column C. The VOC emission factor is equivalent to the percentage of total pentane content (i.e. 5.5% pentane would mean the VOC Emission Factor is 5.5 lbs pentane/lb of beads). Several different types of beads may be used at the facility with different pentane contents. The permittee may add additional EPS Bead Usage rows as needed.

Note 2: \[\text{Column E} = \frac{\text{Column C} \times \text{Column D}}{0.0005}\]. Since natural gas and wood boiler potential VOC emissions are cumulatively relatively small (1.03 tpy combined, calculated using SCC codes 10100602 for natural gas combustion and 10200908 dry for wood combustion), the maximum monthly VOC emissions were hard coded into the tracking sheet as a constant value each month.

Note 3: EP-8 Printing will list amount processed in gallons of ink or conditioner/thinner used per month. VOC emission factor for ink is density multiplied by VOC content (6.68 lb/gallon \times 65.0\% VOC). Similarly, the conditioner/thinner emission factor is calculated as 6.76 lb/gallon \times 100.0\% VOC.

Note 4: Sum of VOC emissions reported in Column E.

Note 5: Sum of values found in “Total VOC Emissions for the Installation for this Month” from the previous 11 months of tracking sheets.

Note 6: Amount reported for Note 4 plus amount reported for Note 5. **A total of less than 250.0 tons indicates compliance.** The total shall include the startup, shutdown, and malfunction emissions as reported to the Air Pollution Control Program’s Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050.
Attachment E
Methanol HAP Compliance Worksheet

Atlas EPS, A Division of Atlas Roofing
Perry County, S35, T84N, R11E
Installation ID: 157-0020

HAP name: ______________________________________  CAS #: ______________________________________

This sheet covers the month of _____________ in the year _____________

<table>
<thead>
<tr>
<th>Column 1</th>
<th>Column 2 (a)</th>
<th>Column 3 (b)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Material Usage</strong></td>
<td><strong>Total</strong></td>
<td><strong>Total</strong></td>
</tr>
<tr>
<td></td>
<td><strong>Gallons of</strong></td>
<td><strong>Methanol</strong></td>
</tr>
<tr>
<td></td>
<td><strong>Material</strong></td>
<td><strong>Emissions</strong></td>
</tr>
<tr>
<td></td>
<td><strong>Used this</strong></td>
<td><strong>(lbs)</strong></td>
</tr>
<tr>
<td></td>
<td><strong>Month</strong></td>
<td></td>
</tr>
<tr>
<td>#4-63 Blue Ink</td>
<td></td>
<td></td>
</tr>
<tr>
<td>#8 Ink Conditioner/Thinner</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(c) Total HAP emissions calculated for this month (tons):

(d) Total Methanol emissions for previous 11 months (tons):

(e) Current 12 month total of HAP emissions (tons): [(b) + (c) – (d)]

(f) SMAL for methanol (CAS 67-56-1) 10.0 tpy

Instructions:
(a) Record the gallons of ink or condition/thinner used during the month for which this sheet covers.
(b) [Column 3 Blue Ink Emissions (lbs)] = 0.04 × 6.68 lb/gal × [Column 2 Gallons used]
   [Column 3 Conditioner/Thinner Emissions (lbs)] = 0.02 × 6.76 lb/gal × [Column 2 Gallons used]
(c) Summation of Column 3 divided by 2000 (yields a value in tons)
(d) Sum the value found in row (c) Total HAP emissions calculated for this month (tons) on the previous 11 months of methanol tracking sheets.
(e) Calculate the new 12 month HAP emissions total by adding the value of row (c) to the value of row (d). **A total of less than 10.0 tons indicates compliance.** The total shall include the startup, shutdown, and malfunction emissions as reported to the Air Pollution Control Program’s Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050.
STATEMENT OF BASIS

INSTALLATION DESCRIPTION
Atlas EPS, a Division of Atlas Roofing (formerly named NPS Corporation and Falcon Foam), is an expandable polystyrene (EPS) block mold manufacturer and fabricator. The production of EPS molds starts with the pre-expansion of the polystyrene beads by injecting steam provided by one sawdust fired and two natural gas fired boilers. After being dried and allowed to cure in the curing silo, the pre-expanded beads are then fed into a block mold, where the beads are further heated by steam. The heat causes the beads to expand and fill the confines of the mold. The blocks then are allowed to cure before they are cut, grinded, and shipped to the customer. The facility is located in an attainment area for all criteria pollutants, is a major source of VOC, and is not a named source. 40 CFR Part 60, Subpart De and 40 CFR Part 63, Subpart JJJJJJ applies to this facility.

Updated Potential to Emit for the Installation and Reported Air Pollutant Emissions, in tons per year
Construction Permit 112017-007 was issued to the installation November 17, 2017. All emission units found in this permit except the Wood Fired Boiler (EP-1) were permitted to construct in this permit. The potential to emit was calculated for the entire facility in the permit and is shown below.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Particulate Matter ≤ Ten Microns (PM₁₀)</td>
<td>17.77</td>
<td>1.87</td>
<td>7.32</td>
<td>8.00</td>
<td>7.61</td>
<td>7.80</td>
</tr>
<tr>
<td>Particulate Matter ≤ 2.5 Microns (PM₂.₅)</td>
<td>15.05</td>
<td>1.61</td>
<td>4.31</td>
<td>4.71</td>
<td>4.48</td>
<td>4.59</td>
</tr>
<tr>
<td>Sulfur Oxides (SO₂)</td>
<td>1.13</td>
<td>0.13</td>
<td>0.35</td>
<td>0.38</td>
<td>0.36</td>
<td>0.37</td>
</tr>
<tr>
<td>Nitrogen Oxides (NOₓ)</td>
<td>26.62</td>
<td>2.55</td>
<td>3.04</td>
<td>3.32</td>
<td>3.16</td>
<td>3.24</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>&lt; 250.0</td>
<td>8.08</td>
<td>93.68</td>
<td>98.33</td>
<td>81.03</td>
<td>73.60</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>30.65</td>
<td>3.12</td>
<td>8.30</td>
<td>9.08</td>
<td>8.63</td>
<td>8.85</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAPs)</td>
<td>13.10¹</td>
<td>0.11</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Methanol</td>
<td>&lt; 10.0</td>
<td>N/D</td>
<td>N/D</td>
<td>N/D</td>
<td>N/D</td>
<td>N/D</td>
</tr>
</tbody>
</table>

¹Potential Emissions for HAPs is the sum of each individual HAP emitted from the facility. No HAP emitted is greater than Methanol, which is limited to less than 10.0 tpy. The total sum of HAPs emitted is less than 25.0 tpy; therefore the installation is a minor source of HAP.
N/D = Not Determined
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 March 7, 2018;
2) 2017 Emissions Inventory Questionnaire, received March 20, 2018;
4) WebFIRE; and
5) All documents listed under Construction Permit History section.

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

None.

Other Air Regulations Determined Not to Apply to the Operating Permit
The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, *Alternate Emission Limits*
This rule is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes*
The Wood Fired Boiler (EP-1) and Gas Fired Boilers (EP-2A & EP-2B) burn fuel for indirect heating and therefore are exempt from this rule per (1)(B)6. If the Wood Fired Boiler was operated constantly for an entire year, 9,772.3 tons of sawdust would be needed to fuel the boiler. This estimate is based off the lower end of wood’s heating content value of 4,500 Btu/lb from AP-42 Section 1.6 *Wood Residue Combustion in Boilers*. At 9,772.3 tons of sawdust a year and using an emission factor of 0.085 pound of PM$_{10}$ per ton of sawdust found from the EPA Memorandum with the subject, “Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country” (May 8, 2014), the Sawdust Handling (EP-10) has the potential to emit 0.0948 pounds of PM$_{10}$ per hour. This emission rate is less than the exemption threshold of 0.5 pounds per hour per (1)(B)12. and therefore the Sawdust Handling (EP-10) is exempt from this rule.
Construction Permit History
The following construction permits were issued to this installation:

- Construction Permit 0187-006, issued January 21, 1987
- Construction Permit 0388-004, issued March 23, 1988
- Construction Permit 1289-006, issued December 20, 1989
- Construction Permit 0695-003, issued June 5, 1995
- Construction Permit 0995-016, issued September 15, 1995
- Construction Permit 0396-005, issued June 10, 1996
- Construction Permit 012002-012, issued January 17, 2002
- Construction Permit 082003-006, issued August 14, 2003
- Construction Permit 112004-002, issued November 3, 2004
- Construction Permit 022011-002, issued February 8, 2011

• On December 13, 2016, a fire destroyed the majority of the equipment permitted under these construction permits. The permitted equipment to survive the fire was the Wood Fired Boiler (EP-1) and two shape mold machines.
• All Special Conditions found in the above permits were superseded by Construction Permit 112017-007.

Construction Permit 022017-007, issued February 16, 2017
Construction Permit 022017-007A, issued June 27, 2017

• The permittee requested to temporarily operate a natural gas boiler and a polystyrene pre-expansion unit. The facility also installed and operated a Wood Fire Boiler and two Shape Mold machines previously permitted but kept in storage.
• The temporary permit was amended in order to include a new Modix MDX230 polystyrene shape molding machine.

Construction Permit 112017-007, issued November 17, 2017

• Application to install two natural gas fired boilers, polystyrene expanders, polystyrene aging, polystyrene fabrication, and ink printing equipment.
• Wood Fired Boiler (EP-1) considered existing equipment in this permit, but evaluated in New Installation Conditioned Potential emissions.
• Special Conditions limit VOC and methanol emissions and require solvents and cleaning solutions to be stored in sealed containers. These conditions were superseded by the requirements found in Permit Conditions PW001 of this permit. The emission limitations from the construction permit were applied to seventeen emission units that were listed in the construction permit. Conditions in Permit Condition PW001 are more stringent than the construction permit’s Special Conditions as they apply to the entire installation as it appears in this operating permit.

New Source Performance Standards (NSPS) Applicability
40 CFR Part 60, Subpart De – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
This subpart sets standards for sulfur dioxide and particulate matter from steam generated units. Sulfur dioxide standards are established for units that combust coal, fuel oil, or coal or oil mixed with other fuels. Emission standards for particulate matter are established for units that combust coal, oil, wood with a heat input capacity of 30 MMBtu/hr or greater, or a mixture of these fuels in which the boiler
commenced construction, reconstruction, or modification after February 28, 2005. The Wood Fired Boilers (EP-1) do not combust the fuel required for sulfur dioxide standards. The boilers do combust the fuel required for particulate matter, but do not meet the heat input capacity or construction, reconstruction, or modification thresholds. The only requirements of this subpart the Wood Fired Boilers (EP-1) are subject to are recordkeeping and reporting requirements which are found in Permit Condition 001. The two Gas Fired Boilers (EP-2A & EP-2B) maximum design heat input capacity is less than 10 MMBtu/hr and are not subject to this subpart per §60.40c(a).

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

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

This subpart establishes national emission limitations and work practice standards for HAPs emitted from industrial, commercial, and institutional boilers and process heaters located at minor sources of HAP. An affected source is considered an existing source if construction or reconstruction commenced on or before June 4, 2010. The Wood Fired Boiler (EP-1) was constructed in 1996 and is considered an existing source. The boiler also meets the definition of a biomass-fired boiler, but not a seasonal or limited use boiler. Conditions for this subpart are found in Permit Condition 002. The two Gas Fired Boilers (EP-2A & EP-2B) meet the definition of a gas-fired boiler and are not subject to this subpart per §63.11195(e).


This subpart sets standards for thermoplastic product process units. The installation purchases EPS beads; therefore no unit meets the definition of a thermoplastic product process unit. The installation does not meet the applicability requirements of §63.1310.


This subpart establishes national emission limitations and work practice standards for HAPs emitted from industrial, commercial, and institutional boilers and process heaters located at major sources of HAP. The installation is not a major source of HAP, and therefore this rule does not apply.

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

40 CFR Part 61, Subpart M – National Emission Standards for Asbestos

This subpart sets standards for asbestos projects and is applied in Section IV. of this permit.

**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 uses a control device to achieve compliance with a relevant standard.
Greenhouse Gas Emissions
Note that this source may be subject to the Greenhouse Gas Reporting Rule. In addition, Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO₂ emissions were not included within this permit. If required to report, the applicant is required to report the data directly to EPA. The public may obtain CO₂ emissions data by visiting http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html.

Other Regulatory Determinations
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants
The Gas Fired Boilers (EP-2A & EP-2B) meet exemption (1)(L) as the units burn only natural gas. The Wood Fired Boiler (EP-1) does not burn any of the exempted fuels and is considered a new source; therefore a 20% opacity limit is applied in Permit Condition 003.

The Sawdust Handling (EP-10) consists of the process of sawdust receiving, movement, and storage at the facility. Sawdust is dumped into a hopper from a tractor trailer that is then conveyed into a sawdust bin/silo. The sawdust is fed from the silo to the wood fired boiler via a screw auger. Except for the truck unloading, all other Sawdust Handling equipment is fully enclosed. The process has two emission release points; the truck dumping into the hopper and the bin vent on the silo. Because the truck dumping is not enclosed, it is considered fugitive emissions and meets exemption (1)(K). Emissions from the bin vent do not meet any exemptions of this rule and is subject to the opacity limit applied in Permit Condition 003.

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds
The Wood Fired Boiler (EP-1) does not meet any exemptions of this rule and is therefore subject to emission limitations. AP-42 Table 1.6-2 indicates an SO₂ emission factor of 0.025 lb/MMBtu which is less than the 8 lb/MMBtu limit of (3)(B)2.A.; therefore the boiler will always be in compliance and no monitoring or recordkeeping is required for this rule. The Gas Fired Boilers (EP-2A & EP-2B) meet exemption (1)(A)2. as the units exclusively combust pipeline natural gas.

10 CSR 10-6.261 Control of Sulfur Dioxide Emissions
The Wood Fired Boiler (EP-1) does not meet any exemptions of this rule and is therefore subject to emission limitations. AP-42 Table 1.6-2 indicates an SO₂ emission factor of 0.025 lb/MMBtu which is less than the 8 lb/MMBtu limit of (3)(B)1.; therefore the boiler will always be in compliance and no monitoring or recordkeeping is required for this rule. The Gas Fired Boilers (EP-2A & EP-2B) meet exemption (1)(A) as the units are fueled exclusively natural gas.

10 CSR 10-6.405 Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating
This rule applies to the Wood Fired Boiler (EP-1) and Gas Fired Boilers (EP-2A & EP-2B). The Gas Fired Boilers (EP-2A & EP-2B) are fueled by natural gas and are deemed in compliance with this rule per (1)(C). The Wood Fired Boiler (EP-1) is deemed to always be in compliance from the following calculations:

The particulate matter emission limitation per (1)(E):
E = 1.31Q⁻⁰.₃₃₈, where Q = 21.86 MMBtu/hr
(Q is the summation of heat input from all affected fuel burning equipment.)
E = 1.31(21.86⁻⁰.₃₃₈) = 0.46 lb/MMBtu
The emission factor for particulate matter (uncontrolled) for the Wood Fired Boiler (EP-1) from AP-42 Table 1.6-1:

\[
\begin{align*}
PM_{\text{Condensible}} &= 0.017 \text{ lb/MMBtu} \\
PM_{\text{Filterable}} &= 0.40 \text{ lb/MMBtu} \\
PM_{\text{Total}} &= PM_{\text{Condensible}} + PM_{\text{Filterable}} = 0.017 \text{ lb/MMBtu} + 0.40 \text{ lb/MMBtu} = 0.417 \text{ lb/MMBtu}
\end{align*}
\]

Since 0.417 lb/MMBtu is less than the emission limit of 0.46 lb/MMBtu, the boilers will never exceed the emission limitation and will always be in compliance. Because all of the affected units are always in compliance, no monitoring, recordkeeping, or reporting is required for Permit Condition 006.

**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 June 12, 2018, the Air Pollution Control Program received four comments from Mark Smith, Chief, Air Permitting and Compliance Branch, EPA Region 7. The comments are addressed in the order in which they appear within the letter.

**Comment 1:** First, the Application for Authority to Operate, submitted by Atlas EPS-Perryville on March 4, 2018 and stamped received by MoDNR on March 7, 2018, includes an Emission Unit Information Form OP-D03 for an Emission Unit EP-11; Embosser. However, Emission Unit EP-11 is not included in the draft Part 70 operating permit and there is no explanation of its exclusion in the Statement of Basis. Also, all seven (7) permit conditions within this draft Part 70 operating permit identify either a Wood-Fired Boiler or a Wood-Fired Boiler and two (2) Gas-Fired Boilers. Yet, neither the Installation Description in the Statement of Basis, nor the Installation Description on the draft Part 70 cover page, provide any description of boilers or their process function. EPA recommends MoDNR consider describing and including all the processes and Emission Units, at the Atlas EPS-Perryville facility, in the Part 70 operating permit.

**Response to Comment:** The Embosser was excluded in the draft of the Part 70 operating permit because an inspection of the facility from 2018 listed the Embosser as dismantled. After speaking with the installation, it was determined that a new Embosser was recently installed and has now been included in this operating permit. The Installation Description in the Statement of Basis and cover page have been edited to include a description of the boilers and their process function.

**Comment 2:** Second, Permit Condition PW001 incorporates special conditions included in Permit to Construct #112017-007 issued November 17, 2017. The Emission Limitations in Permit Condition PW001 are based on Special Conditions 2.A. and 2.B. Emission Limitation 10 limits the emissions of VOCs to less than 250.0 tons in any 12-month consecutive period from the *entire installation* (emphasis added). Emission Limitation 2) limits the emissions of methanol to less than 10.0 tons in any consecutive 12-month period from the *entire installation* (emphasis added). However, neither emission limitation 1), based on Special Condition 1.A., nor emission limitation 2), based on Special Condition 2.B., accurately reflect the requirements in Permit to Construct #112017-007. Permit to Construct #112017-007 defined the “*entire installation*” (emphasis added) as the list of emission sources in Table 2 of the Project Description included in Permit to Construct #112017-007. EPA recommends MoDNR consider completely incorporating the special conditions from construction permits, considering the “*entire installation*” (emphasis added) as specified in Permit to Construct #112017-007 through the inclusion of the list of emission sources from Table 2, within this operating permit.

**Response to Comment:** Permit Condition PW001 has been changed to a voluntary limit. It keeps the same conditions as the construction permit, but is more stringent as it includes the emission units that were excluded from the conditions in the construction permit. An explanation was added to the statement of basis clarifying the change to this Permit Condition.

**Comment 3:** Third, Permit Condition 001 incorporates applicable requirements from 40 CFR part 60, Subpart Dc: *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*, that pertain to Emission Unit EP-1; Wood-Fired Boiler. Record keeping requirements 1) and 2) specify that the permittee shall record and maintain record of the amount of *each fuel combusted*
(emphasis added). Nowhere within this draft Part 70 is there a discussion of the fuels to be combusted in Emission Unit EP-1. In fact, the application for Authority to Operate specifies only a "Primary Fuel Type" (sawdust) to be combusted in Emission Unit EP-1. Therefore, EPA recommends MoDNR consider revising the language in Record keeping requirements 1) and 2), in Permit Condition 001, to reflect actual conditions used by Atlas EPA-Perryville.

**Response to Comment:** Language in Permit Condition 001, Recordkeeping requirements 1) and 2) has been changed to specify Atlas EPS record the amount of sawdust combusted in the boiler.

**Comment 4:** Finally, Permit Condition 002 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*, that pertain to Emission Unit EP-1; Wood-Fired Boiler. Notification/Record keeping/Reporting requirement 2) stipulates that the permittee submit annual compliance certification to the Air Pollution Control Program’s Compliance/Enforcement Section in Jefferson City. Also, Notification/Record keeping/Reporting requirement 6) stipulates that the permittee shall submit deviation reports to the Air Pollution Control Program’s Compliance and Enforcement Section in Jefferson City. However, according to 10 CSR 10-6.075, MoDNR indicates the Primary Regulating Agency for Subpart JJJJJJ is the EPA. Therefore, if EPA is the Primary Regulating Agency, it would appear that EPA Missouri Air Compliance Coordinator is the more appropriate recipient of the permittee’s reports required by Permit Condition 002 and EPA recommends MoDNR consider revising the Notification/Record keeping/Reporting requirements 2) and 6), in Permit Condition 002.

**Response to Comment:** Permit Condition 002, Notifications/Recordkeeping/Reporting requirement 2) language has been changed to submit an annual compliance certification report to the EPA Administrator. Notifications/Recordkeeping/Reporting requirement 6) refers the permittee to follow the requirements of Section V of the permit. 10 CSR 10-6.065(6)(C)3 Compliance Requirements requirement 4. states that the permittee shall submit an annual certification that proves that they are in compliance with all federally enforceable terms and conditions contained in the permit to the EPA Region VII office. As such, the language of Notifications/Recordkeeping/Reporting requirement 6) in Permit Condition 002 has not been altered.
Mr. Bill Calla  
Atlas EPS, A Division of Atlas Roofing  
911 Industrial Drive  
Perryville, MO 63673  

Re: Atlas EPS, A Division of Atlas Roofing, 157-0020  
Permit Number: OP2018-061  

Dear Mr. Calla:  

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:jsj  
Enclosures  

c: PAMS File: 2018-03-013

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