



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: OP2010-128
Installation ID: 189-1012
Expiration Date: DEC 06 2015
Project Number: 2005-02-068

Installation Name and Address

Beltservice Corporation
4143 Rider Trail North
Earth City, MO 63045

Parent Company's Name and Address

Beltservice Corporation
4143 Rider Trail North
Earth City, MO 63045

Installation Description:

Beltservice Corporation manufactures custom rubberized conveyor belts for various industries. The belts are purchased in large rolls and then cut to specific lengths. Some belts are then sold "as is", while others are milled to a certain thickness and fitted with side walls and end cleats. The milling operation involves the removal of rubber from the belt surface by running the belt through a grinding machine. The rubber particles are collected into a cyclone/baghouse collector located on the west wall of the building. The larger particles fall out into the cyclone hopper and are emptied into collection drums to be sent to the landfill. The smaller diameter particles are collected by the baghouse. After the belts are milled, rubberized adhesive is applied by paint brush to the sides of the belt to join a side wall to the belt to provide additional function. The rubberized adhesive is also added to a rubberized end piece that contains the end cleats. Some adhesives contain VOCs and HAPs, while other adhesives contain only VOCs.

DEC 07 2010

Effective Date

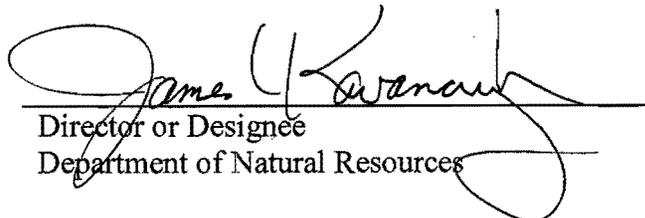

Director or Designee
Department of Natural Resources

Table of Contents

I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING	3
INSTALLATION DESCRIPTION	3
EMISSION UNITS WITH LIMITATIONS	3
EMISSION UNITS WITHOUT LIMITATIONS.....	3
DOCUMENTS INCORPORATED BY REFERENCE.....	4
II. PLANT WIDE EMISSION LIMITATIONS.....	5
Permit Condition PW001	5
10 CSR 10-6.170, Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin.....	5
Permit Condition PW002	6
10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants	6
Permit Condition PW003	7
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations	7
40 CFR Part 63, Subpart Mmmm, Surface Coating of Miscellaneous Metal Parts	7
III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS	9
EU0010—Rubber Belt Grinding Machines (CD-1)	9
Permit Conditions EU0010-001	9
10 CSR 10-6.400, Restriction of Emissions of Particulate Matter from Industrial Processes.....	9
EU0020—Rubber Belt Grinding Machines (CD-2)	10
Permit Conditions EU0020-001	10
10 CSR 10-6.400, Restriction of Emissions of Particulate Matter from Industrial Processes.....	10
EU0030—Adhesive Application	10
Permit Conditions EU0030-001	10
10 CSR 10-6.075, Maximum Achievable Control Technology Regulations	10
40 CFR Part 63, Subpart Oooo, Printing, Coating and Dyeing of Fabrics and Other Textiles	10
EU0040—Parts Washer	12
Permit Conditions EU0040-001	12
10 CSR 10-5.300, Control of Emissions from Solvent Metal Cleaning.....	12
IV. CORE PERMIT REQUIREMENTS	15
V. SAINT LOUIS COUNTY AIR POLLUTION CONTROL CODE REQUIREMENTS	20
VI. GENERAL PERMIT REQUIREMENTS.....	23
VII. ATTACHMENTS	29
ATTACHMENT A: VISIBLE EMISSIONS WALK-THROUGH FORM	30
ATTACHMENT B: VISIBLE EMISSION METHOD 9 OBSERVATION FORM	31

I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Beltservice Corporation manufactures custom rubberized conveyor belts for various industries. The belts are purchased in large rolls and then cut to specific lengths. Some belts are then sold “as is”, while others are milled to a certain thickness and fitted with side walls and end cleats. The milling operation involves the removal of rubber from the belt surface by running the belt through a grinding machine. The rubber particles are collected into a cyclone/baghouse collector located on the west wall of the building. The larger particles fall out into the cyclone hopper and are emptied into collection drums to be sent to the landfill. The smaller diameter particles are collected by the baghouse. After the belts are milled, rubberized adhesive is applied by paint brush to the sides of the belt to join a side wall to the belt to provide additional function. The rubberized adhesive is also added to a rubberized end piece that contains the end cleats. Some adhesives contain VOCs and HAPs, while other adhesives contain only VOCs.

Reported Air Pollutant Emissions (Tons per Year)								
Year	Volatile Organic Compounds (VOC)*	Hazardous Air Pollutants (HAPs)*	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Carbon Monoxide (CO)	Lead (Pb)	Particulate Matter ≤ Ten Microns (PM-10)	Particulate Matter 2.5-10 Microns (PM-2.5)
2004	31.74	31.96	0.00	0.41	0.34	0.00	0.86	0.01
2005	37.38	33.68	0.00	0.46	0.38	0.00	0.91	0.01
2006	40.48	36.09	0.00	0.47	0.39	0.00	0.82	0.01
2007	39.45	34.46	0.00	0.52	0.43	0.00	1.02	0.01
2008	42.47	36.80	0.00	0.56	0.47	0.00	1.00	0.01

* Compounds that are categorized as a VOC and a HAP are counted in both the VOC and the HAP column.

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EU0010	Rubber Belt Grinding Machines (CD-1)
EU0020	Rubber Belt Grinding Machines (CD-2)
EU0030	Adhesive Application
EU0040	Parts Washer

EMISSION UNITS WITHOUT LIMITATIONS

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

Description of Emission Unit

Belt Cleaning Tables
 Two (2) Natural Gas Boilers (1.255 and 1.874 mmBtu/hr)
 25 kW Natural Gas Emergency Generator, Installed 2004

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

None.

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.

Permit Condition PW001

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

Emission Limitations:

No person may 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 to go beyond the premises of origin in quantities that the particulate matter: remains visible in the ambient air beyond the property line of origin; or may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter on these surfaces shall be determined to a reasonable degree by a technique proven to be accurate and approved by the Director.

Monitoring:

- 1) Conduct inspections of the facility sufficient to determine compliance with this regulation. If a violation of this regulation is discovered, the facility shall undertake corrective action to eliminate the violation.
- 2) The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Record Keeping:

- 1) A log (Attachment A or similar record) must be maintained noting the following:
 - a) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin;
 - b) Equipment malfunctions that could cause an exceedance of 10 CSR 10-6.170;
 - c) Any violations of 10 CSR 10-6.170 and any corrective actions undertaken to correct the violation.
- 2) Records shall be completed and available for review by the 10th day following the end each month.
- 3) Retain records for the previous sixty (60) month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

Report to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the discovery of any exceedance of any of the terms imposed by this regulation.

Permit Condition PW002

10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants
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Emission Limitations:

- 1) The permittee shall not discharge into the ambient air from any single source of emission whatsoever any air contaminant of opacity greater than 20% unless it is an existing source (existing prior to March 24, 1967), which emits less than 25 lbs/hr PM.
- 2) If it is an existing source, which emits less than 25 lbs/hr PM, then the permittee shall not discharge into the ambient air any air contaminant of an opacity greater than 40%.
- 3) A source with a 20% limit may emit air contaminants with an opacity over 20%, but not greater than 40% for an aggregate length of time not to exceed six (6) minutes in any 60 minutes.
- 4) Where the presence of uncombined water is the only reason for failure of an emission to meet the requirements, the requirements shall not apply.

Monitoring:

- 1) Conduct visual emission observations of all subject emission units using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations are required. For emission units where visible emissions are observed, the source representative shall then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
 - a) Observations must be made once per month. If a violation is noted, then-
 - b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then monthly observations shall be resumed.

Record Keeping:

- 1) Maintain records of all observation results noting whether any air emissions (except for water vapor) were visible from the emission units (Attachment A).
- 2) Maintain records any Method 9 test performed in accordance with this permit condition (Attachment B).
- 3) Maintain records of any equipment malfunctions.
- 4) Records shall be completed and available for review by the 10th day following the end of each month.
- 5) Retain records for the previous sixty (60) month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

Report to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the discovery of an exceedance of the opacity limit.

Permit Condition PW003

10 CSR 10-6.075, Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart MMMM, Surface Coating of Miscellaneous Metal Parts
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Emission Limitation:

- 1) Beltservice is subject to the General Use Coating Subcategory of this regulation, which limits organic HAP emissions from existing general use coating sources to no more than 2.6 pounds per gallon coating solids used during each twelve-month compliance period. (§63.3890(b)(1))
- 2) Beltservice has chosen to demonstrate compliance using the Compliant Material Option, which requires the facility to demonstrate the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in #1 above, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. (§63.3891(a))

Monitoring/ Record Keeping:

- 1) You must maintain records as specified below: (§63.3930)
 - a) A copy of each notification and report that you submitted to comply with this subpart, and the documentation supporting each notification and report.
 - b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If you conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, you must keep a copy of the complete test report. If you use information provided to you by the manufacturer or supplier of the material that was based on testing, you must keep the summary sheet of results provided to you by the manufacturer or supplier. You are not required to obtain the test report or other supporting documentation from the manufacturer or supplier.
 - c) For each compliance period, a record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option you used.
 - d) For each compliance period where the compliant material option was used, a record of the calculation of the organic HAP content for each coating, using Equation 2 of §63.3941.
 - e) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If you are using the compliant material option for all coatings at the source, you may maintain purchase records for each material used rather than a record of the volume used.
 - f) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight.
 - g) A record of the volume fraction of coating solids for each coating used during each compliance period.
 - h) You must keep records of the date, time, and duration of each deviation.

- 2) Records shall be completed and available for review by the 10th day following the end of each month.
- 3) Retain records for the previous sixty (60) month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

- 1) Semi-annual compliance reports must be submitted every six months.
 - a) Semi-annual reports are due by July 31st for monitoring which covers the January through June time period. (§63.3920(a)(iii))
 - b) Semi-annual reports are due by January 31st for monitoring which covers the July through December time period. (§63.3920(a)(iii))
- 2) Semi-annual compliance reports shall include the following information: (§63.3920(a)(3))
 - a) Company name and address.
 - b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 - c) Date of report and beginning and ending dates of the reporting period. The reporting period is the six-month period ending on June 30th or December 31st. Note that the information reported for each of the six months in the reporting period will be based on the last twelve months of data prior to the date of each monthly calculation.
 - d) Identification of the compliance option or options specified in §63.3891 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates for each option you used.
 - e) If there was a deviation from the organic HAP emission content requirements in §63.3890, the semi-annual compliance report shall include the following: (§63.3920(a)(5))
 - i) Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used.
 - ii) The calculation of the organic HAP content (using Equation 2 of §63.3941) for each coating identified in paragraph (a)(5)(i) of this section. You do not need to submit background data supporting this calculation (*e.g.*, information provided by coating suppliers or manufacturers, or test reports).
 - iii) The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in paragraph (a)(5)(i) of this section. You do not need to submit background data supporting this calculation (*e.g.*, information provided by material suppliers or manufacturers, or test reports).
 - iv) A statement of the cause of each deviation.
 - f) If there were no deviations from the emission limit established above, you must submit a statement that there were no deviations from the emission limitations because you used no coatings for which the organic HAP content exceeded the applicable emission limit, and you used no thinner and/or other additive, or cleaning material that contained organic HAP, determined according to §63.3941(a), during the reporting period. (§63.3920(a)(4) and (§63.3942(c))

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.

EU0010—Rubber Belt Grinding Machines (CD-1)
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General Description:	Grinding of Rubber Conveyor Belts: Cleat and Sidewall Path Grinder and Radial Arm Grinder, controlled by cyclone and baghouse
Manufacturer/Model #:	Cleat and Sidewall Path Grinder: Manufacturer: Beltservice, Model #BSC 1234 Radial Arm Grinder: Manufacturer: DeWalt, Model #WDG-AQM57Q5K CD-1: Cyclone and Baghouse: Manufacturer: Torit, Model #20-5-FB/C-1266
EIQ Reference # (2008):	EP001
STLCO Operating Permit #:	5130

Permit Conditions EU0010-001

10 CSR 10-6.400, Restriction of Emissions of Particulate Matter from Industrial Processes

Emission Limitation:

Particulate matter shall not be emitted from this emission unit in excess of that allowed by the formula: $PM \text{ lb/hr} = 4.10P^{0.67}$, where P is the process weight in tons/hr. The limit is 2.083 lbs/hr.

Monitoring/Record Keeping:

- 1) Maintain an accurate record of monthly throughput of dust generated, hours operated, emission factors, and actual hourly emissions of particulate matter emitted into the atmosphere from these emission units.
- 2) Retain records for the previous sixty (60) month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

Report to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of 10 CSR 10-6.400.

EU0020—Rubber Belt Grinding Machines (CD-2)

General Description:	Grinding of Rubber Conveyor Belts: Belt Grinder “Willie” and 24” x 120” Lathe, controlled by cyclone and baghouse
Manufacturer/Model #:	Belt Grinder “Willie”: Manufacturer: Curtin Herbert, Model #BSC 1200 24” x 120” Lathe: Manufacturer: LeBlond, Model #BSC 1718/N-1567 CD-2: Cyclone and Baghouse: Manufacturer: Torit, Model #B-3940
EIQ Reference # (2008):	EP001
STLCO Operating Permit #:	6583

Permit Conditions EU0020-001

10 CSR 10-6.400, Restriction of Emissions of Particulate Matter from Industrial Processes

Emission Limitation:

Particulate matter shall not be emitted from this emission unit in excess of that allowed by the formula: $PM \text{ lb/hr} = 4.10P^{0.67}$, where P is the process weight in tons/hr. The limit is 11.79 lbs/hr.

Monitoring/Record Keeping:

- 1) Maintain an accurate record of monthly throughput of dust generated, hours operated, emission factors, and actual hourly emissions of particulate matter emitted into the atmosphere from these emission units.
- 2) Retain records for the previous sixty (60) month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

Report to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of 10 CSR 10-6.400.

EU0030—Adhesive Application

General Description:	Brush application of rubberized adhesive to add side walls or end cleats to belts
Manufacturer/Model #:	N/A
EIQ Reference # (2008):	EP002
STLCO Operating Permit #:	6372

Permit Conditions EU0030-001

10 CSR 10-6.075, Maximum Achievable Control Technology Regulations
 40 CFR Part 63, Subpart OOOO, Printing, Coating and Dyeing of Fabrics and Other Textiles

Emission Limitation:

Beltservice is subject to the Coating and Printing Subcategory of this regulation, and has chosen to comply with this limit using 63.4291(a)(2) Emission Rate Without Add-on Controls. Table 1 of this subpart offers several options to comply using this method. Beltservice has chosen to comply by limiting existing operations to 0.12 kilograms organic HAP per kilogram of coating solids applied calculated as a rolling twelve-month average emission rate.

Monitoring/ Record Keeping:

- 1) The organic HAP emission rate for each compliance period, determined according to §63.4331(a) for coating operations must be less than or equal to 0.12 kilograms organic HAP per kilogram of coating solids applied. Each month is a compliance period consisting of that month and the preceding 11 months. The calculations in §63.4331 must be performed on a monthly basis. (§63.4332(a))
- 2) Records shall be completed and available for review by the 10th day following the end of each month.
- 3) Retain records for the previous sixty (60) month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

- 1) Semi-annual compliance reports must be submitted every six months.
 - a) Semi-annual reports are due by July 31st for monitoring which covers the January through June time period. (§63.4311(a)(1)(iii))
 - b) Semi-annual reports are due by January 31st for monitoring which covers the July through December time period. (§63.4311(a)(1)(iii))
- 2) Semi-annual compliance reports shall include the following information: (§63.4311(a)(3))
 - a) Company name and address.
 - b) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
 - c) Date of report and beginning and ending dates of the reporting period. The reporting period is the six-month period ending on June 30 or December 31.
 - d) Identification of the compliance option or options specified in §63.4291 that you used on each coating operation during the reporting period. If you switched between compliance options during the reporting period, you must report the beginning and ending dates you used each option.
 - e) If you used the emission rate without add-on controls, the calculation results for each compliance period ending each month during the six-month reporting period.
 - f) If the organic HAP emission rate for any compliance period exceeds 0.12 kilograms organic HAP per kilogram of coating solids applied, this is a deviation from the emission limitation for that compliance period and must be reported in the semi-annual compliance report. The report shall include the following: (§63.4311(a)(6))
 - i) The beginning and ending dates of each compliance period during which the organic HAP emission rate exceeded the applicable emission limit.
 - ii) The calculations used to determine the organic HAP emission rate for the compliance period in which the deviation occurred. You must submit the calculations for Equations 1, 1A and 1B, 2, and 3 in §63.4331 for coating operations. You do not need to submit background data supporting these calculations (*e.g.*, information provided by materials suppliers or manufacturers, or test reports).

- iii) A statement of the cause of each deviation.
- g) If there were no deviations from the emission limit established above, you must submit a statement that the coating operations were in compliance with the emission limitations during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to the applicable emission limit. (§63.4332(c) and §63.4311(a)(4))

EU0040—Parts Washer

General Description:	(1) Cold cleaner (maintenance)
Manufacturer/Model #:	Gray Mills
EIQ Reference # (2008):	N/A
STLCO Operating Permit #:	7244

Permit Conditions EU0040-001

10 CSR 10-5.300, Control of Emissions from Solvent Metal Cleaning

Emission Limitation:

- 1) Equipment specifications (Section (3)(A)1 Cold Cleaners):
 - a) The cold cleaning solvent vapor pressure shall not exceed 1.0 millimeters of Mercury (mmHg) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)). [Per 10 CSR 10-5.300(1)(D)2.B., cold cleaners using solvents regulated under any federal NESHAP shall be exempt from the solvent vapor pressure requirement].
 - b) Each cold cleaner will have a cover, which will prevent the escape of solvent vapors while in the closed position, or enclosed reservoir, which will limit the escape of solvent vapors whenever parts are not being processed in the cleaner.
 - c) Exemptions under (1)(D) of the regulation may apply.
 - d) Alternate methods for reducing cold cleaning emissions may be used if the permittee shows the emission control is at least equivalent to the control in (a) above and is approved by the Director.
 - e) When one (1) or more of the following conditions exist the design of the cover shall be such that it can easily be operated with one (1) hand and without disturbing the solvent vapors in the tank. (For covers larger than ten (10) square feet, this shall be accomplished by either mechanical assistance or by a power system).
 - i) The solvent volatility is greater than 0.3 psi at one hundred degrees Fahrenheit (100°F)
 - ii) The solvent is agitated.
 - iii) The solvent is heated.
 - f) A drainage facility allowing parts to drain while the cover is closed is required.
 - g) If an internal drainage facility as in (f) cannot fit into the cleaning system and the solvent volatility is less than 0.6 psi at one hundred degrees Fahrenheit (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath.
 - h) Solvent sprays shall be a solid fluid stream and at a pressure which does not cause splashing above or beyond the freeboard.
 - i) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment.

- j) Any cold cleaner which uses a solvent that has a solvent volatility greater than 0.6 psi at one hundred degrees Fahrenheit (100°F) or heated above one hundred twenty degrees Fahrenheit (120°F) must have one (1) of the following control devices:
 - i) A freeboard ratio of at least 0.75
 - ii) Water cover (solvent must be insoluble in and heavier than water)
 - iii) Another control system that has a mass balance demonstrated emission reduction efficiency of at least sixty-five percent (65%) and is approved by the Director prior to use.
- 2) Operating procedures (Section (3)(B)1 Cold Cleaners):
 - a) Covers shall be closed whenever parts are not being handled in the cleaners, or solvent must drain into an enclosed reservoir.
 - b) Cleaned parts shall be drained in the free board area for fifteen (15) seconds, or until dripping stops, whichever is longer.
 - c) Whenever a cold cleaner fails to perform within the operating parameters established by this rule, the unit shall be shut down and secured until trained service personnel are able to restore operation within the established parameters.
 - d) Solvent leaks shall be repaired immediately, or the degreaser shall be shut down and the leaks secured until they can be more permanently repaired.
 - e) Waste material removed from a cold cleaner shall be disposed of by one of the methods listed in the rule or equivalent (after the Director's approval) and in accordance with 10 CSR 25, as applicable.
 - f) Waste solvent shall be stored in closed containers only.
- 3) Operator and Supervisor Training (Section (3)(C)):
 - a) Persons who operate a cold cleaner shall be trained in the operational and equipment requirements specified in this rule.
 - b) The supervisor of any person who operates a cold cleaner shall receive equal or greater operational training than the operator.
 - c) Persons who operate a cold cleaner shall receive a procedural review at least once each twelve (12) months.

Monitoring/ Record Keeping:

- 1) Monthly records of the following shall be maintained:
 - a) Types and amounts of solvent containing waste material from cleaning or degreasing operations:
 - i) Transferred to a contract reclamation service or disposal facility
 - ii) Distilled on the premises
 - b) Maintenance and repair logs for the cold cleaner and any associated control equipment.
- 2) For cold cleaners subject to (3)(A)1 (a) or (b) the following records for each purchase of cold cleaning solvent shall be maintained:
 - a) The name and address of the solvent supplier;
 - b) The date of purchase;
 - c) The type of solvent; and
 - d) The vapor pressure of the solvent in mmHg at 20°C (68°F)
- 3) Keep a record of the cold cleaner training for each employee.
- 4) Records shall be completed and available for review by the 10th day following the end of each month.
- 5) Retain records for the previous sixty (60) month period and make them available to the St. Louis County Air Pollution Control Program, or its designated agent, at any reasonable time.

Reporting:

Report to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, no later than thirty (10) days after the discovery of any exceedance of the cold cleaner requirements established in 10 CSR 10-5.300.

IV. Core Permit Requirements

This section lists excerpts from applicable regulations. The installation is responsible for complying with the cited portions of the regulations as found in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR). All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.045 Open Burning Restrictions

No person may conduct, cause, permit, or allow the disposal of tires, petroleum-based products, trade waste, construction or demolition waste, salvage operation waste, or asbestos containing materials by open burning, except as permitted by this regulation.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the Paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the Paragraph 1 list and shall be submitted not later than 10 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.

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

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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

10 CSR 10-6.100 Alternate Emission Limits

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

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) 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.
- 3) The fees shall be due on the date specified by 10 CSR 10-6.110(3)(D)F each year for emissions produced during the previous calendar year. The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the Director.

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

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

10 CSR 10-6.150 Circumvention

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

10 CSR 10-6.180 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. Qualified personnel shall perform all tests.
- 2) The Director may conduct tests of emissions of air contaminants from any source. Upon request of the Director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The Director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

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

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

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits,” and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the Director.

- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits," and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources;"
 - ii) 10 CSR 10-6.040, "Reference Methods;"
 - iii) 10 CSR 10-6.070, "New Source Performance Standards;"
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants;" or
 - b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

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

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

10 CSR 10-5.160 Control of Odors in the Ambient Air

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

- 1) Residential, recreational, institutional, retail sales, hotel or educational premises.
- 2) Industrial premises when air containing odorous matter is diluted with twenty (20) or more volumes of odor-free air; or
- 3) Premises other than those in Paragraphs (1)A.1. and 2. of the rule when air containing odorous matter is diluted with four (4) or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when thirty percent (30%) or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least twenty (20) people or seventy-five percent (75%) of those exposed if fewer than twenty (20) people are exposed.

10 CSR 10-5.450 Coating of VOC Emissions from Traffic Coatings

- 1) No person shall supply, sell, offer for sale, apply, or solicit the application of any traffic coating, which at the time of sale or manufacture contains more than 1.26 pounds VOC per gallon, excluding water, exempt compounds, and any colorant added to tint bases, or manufacture, blend, or repackage such a coating for use within the St. Louis metropolitan area without the approval of the staff director.
- 2) All VOC-containing materials shall be stored in closed containers when not in use. In use includes, but is not limited to, being accessed, filled, emptied, or repaired.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

V. Saint Louis County Air Pollution Control Code Requirements

Section 612.040, Air Quality Standards and Air Pollution Control Regulations

St. Louis County Air Pollution Control Program may enforce Missouri Code of State Regulations as adopted and promulgated by the Air Conservation Commission of the State of Missouri consisting of Title 10, Division 10, Chapter 5 and 6.

Section 612.100, Emergency Abatement of Violation

By written approval of the County Executive, any facility indirectly or directly discharging any air contaminant in violation of the Saint Louis County Air Pollution Control Code where it is the opinion of the Director that the discharge creates an emergency which requires immediate action to protect the public health, shall order the person in writing to discontinue immediately.

Section 612.110, Permits Required

The permittee shall obtain St. Louis County Air Pollution Control Program operating permits for its installation. The permittee shall not commence construction, modification, or major modification of any installation subject to this rule without obtaining a permit from the St. Louis County Air Pollution Control Program.

Section 612.120, Permits to be Visibly Affixed or Placed

The permittee shall visibly affix St. Louis County Air Pollution Control Program Permit on or near permitted equipment.

Section 612.200, Testing Prior to Granting of Operating Permit

Before an authority to construct or permit to operate is granted, the Director may require the applicant to conduct tests to determine the kind or amount of the air contaminant emitted from the equipment. Such tests shall be conducted, reviewed and certified by a licensed engineer under Chapter 327 RSMo 1959. The permittee shall notify the St. Louis County Air Pollution Control Program of the time and place of testing for the purpose of witnessing the test.

Section 612.220, Suspension or Revocation of Permits

The Director may suspend or revoke a permit to operate or authority to construct for willful or continued violation of the Saint Louis County Air Pollution Control Code.

Section 612.250 Fees, When Payable, Exceptions

Fees for authority to construct and operating permits in the amounts provided in Section 612.260 shall be paid to the Director except as provided in Subsections 3 and 4 of this rule.

Section 612.260, Schedules

The permittee shall pay the St. Louis County Air Pollution Control Program Construction and Operating Permit fees when applicable and annual Emission and Inspection fees in accordance with this rule.

Section 612.280, Testing by Order of the Board

If any article, machine, equipment or other contrivance is in violation of the Saint Louis County Air Pollution Control Code, the Director may file with the Board for its approval an order directing the permittee of such equipment to conduct such tests as are necessary in the opinion of the Director and approved by the Board to determine whether the equipment is in violation of this Code. The entire test results shall be reviewed and certified by an engineer licensed under Chapter 327, RSMo 1959. The engineer shall be selected by the permittee and approved by the Board. The permittee shall give at least seven (7) days notice prior to the commencement of the test. The permittee shall submit the test results to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017.

Section 612.290, Right of Entry; Inspections; Samples

The permittee shall allow the Director or His agent to enter at all times with reasonable notice, inspect any equipment, control apparatus, fuel, matter or things which affect or may affect the emission of air contaminants, inspect any records relating to the use of any equipment or control apparatus which affect or may affect the emission of air contaminants, and sample any equipment, control apparatus, fuel, matter or things which affect or may affect the emission of air contaminants.

Section 612.310, Upset Conditions, Breakdown or Scheduled Maintenance

Emissions exceeding any of the limits established by the St. Louis County Air Pollution Control Code as a direct result of unavoidable upset conditions in the nature of the process or unavoidable and unforeseeable breakdown of any air pollution equipment or related operating equipment or as a direct result of shutdown of such equipment for necessary scheduled maintenance, shall not be deemed in violation of this Code provided the following are met:

- 1) Such occurrence in the case of unavoidable upset in or breakdown of equipment shall have been reported to the Director within twenty-four (24) hours after the occurrence.
- 2) In the case of shutdown for necessary scheduled maintenance, the intent to shut down shall be reported to the Director at least twenty-four (24) hours prior to the shut down and the exception provided by this section shall only apply in those cases where maximum reasonable effort, including off-shift labor where required, has been made to accomplish such maintenance during periods of non-operation of any related source operation and that it would be unreasonable or impossible to shut down the source operation during the maintenance period.
- 3) The person, firm or corporation responsible for such emission shall submit to the Director a full report of such occurrence including a statement of all known causes and of the scheduling and nature of the actions to be taken to minimize or eliminate future occurrences including but not limited to action to correct the conditions causing such emission to exceed said limits, to reduce the frequency of occurrence of such conditions, to minimize the amount by which said limits are exceeded and to reduce the length of time for which said limits are exceeded.

Section 612.340, Air Pollution Nuisances Prohibited

- 1) It is unlawful for the permittee to cause the escape of such quantities of soot, cinders, noxious acids, fumes and gases or other particulate matter from whatever source in such place or matter as to be detrimental to any person or the public or to endanger the health, comfort and safety of any person or the public, injury or damage to property or business.

- 2) No person shall cause or permit the engine of a motor vehicle, other than an emergency vehicle, to idle for longer than three (3) consecutive minutes while parking, standing or stopped as defined in the St. Louis County Traffic Code, unless the engine is being used to operate a loading, unloading or processing device.

Section 612.380, Interfering with or Obstructing Division Personnel

No person shall hinder, resist, interfere with or obstruct the Director or any Division employee in carrying out any duty for the Director or the Board.

Section 612.530, St. Louis County Air Pollution Control Program Asbestos Abatement Rules and Regulations—Registration, Notification and Performance Requirements

The permittee shall conduct all asbestos abatement projects within the procedures and requirements established in 612.530.

VI. General Permit Requirements

This section lists excerpts from applicable regulations. The installation is responsible for complying with the cited portions of the regulations as found in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR). All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

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

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

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

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any St. Louis County Air Pollution Control Program or the Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) Semi-annual Monitoring Reports
 - i) The permittee shall submit a semi-annual report of all required monitoring by:
 - (1) October 1st for monitoring which covers the January through June time period, and
 - (2) April 1st for monitoring which covers the July through December time period.
 - ii) Each semi-annual monitoring report must identify any deviations from permit requirements since the previous report that have been monitored by the monitoring systems required under the permit, and any deviation from the monitoring, record keeping and reporting requirements of the permit.
 - iii) These reports shall be submitted to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, and the Missouri Department of Natural Resources Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.
 - b) Supplemental Reports
 - i) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - ii) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two (2) 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.

- iii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iv) Any other deviations identified in the permit as requiring more frequent reporting than the annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- c) 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.
- d) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

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

10 CSR 10-6.065, §(6)(C)1.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 under this rule.

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

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

10 CSR 10-6.065, §(6)(C)6. Permit Shield

Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date of permit issuance, provided that—

- 1) The applicable requirements are included and specifically identified in the permit; or
- 2) 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 the permit expressly includes that determination or a concise summary of it. The Statement of Basis constitutes the referenced determination of applicability.

- 3) 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 of 10 CSR 10-6.065.

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

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

10 CSR 10-6.065, §(6)(C)8. Operational Flexibility

Operational flexibility (installation changes not requiring permit revisions). This installation 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 and 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 installation shall notify the St. Louis County Air Pollution Control Program and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, at least seven (7) 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 St. Louis County Air Pollution Control Program and the Missouri Department of Natural Resources Air Pollution Control Program's Enforcement Section, describing the change to be made, the date on which the change will occur, any changes in emissions, and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the permitting authority shall place a copy with the permit in the public file. Written notice shall be provided to the administrator and the permitting authority at least seven (7) days before the change is to be made. If less than seven (7) days' notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the administrator and the permitting authority 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

Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:

- 1) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
- 2) The permittee must provide written notice of the change to the St. Louis County Air Pollution Control Program, 74 Clarkson Wilson Ctr., Chesterfield, MO 63017, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
- 3) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.065, §(6)(E)6.A Reopening-Permit for Cause

This permit may be reopened for cause if:

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

- 3) The St. Louis County Air Pollution Control Program, the Missouri Department of Natural Resources, or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.020(2)(R)11 Responsible Official

John Frierdich, Safety Director, was established as the responsible official for Beltservice Corporation in the Title V renewal application, dated December 3, 2006. 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 St. Louis County Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

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

VII. Attachments

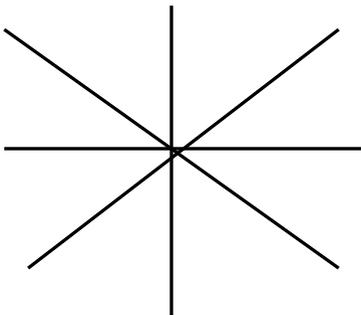
Attachments follow.

ATTACHMENT B: Visible Emission Method 9 Observation Form

This worksheet may be used to meet the record keeping requirements for Permit Condition PW002.

Source Name _____
 Address _____
 Observation Point _____
 Stack Identification _____
 Stack: Distance from _____ Height _____
 Temp _____ %RH _____
 Sky Condition _____
 Color of Emission _____

Quadrant: Draw symbols below in appropriate place to mark wind direction and speed, observer's location and sun location.



(Stack is at center)

Observer _____
 Observer's Signature _____
 Date _____ Certification Date _____
 Observer Began _____ Ended _____

COMMENTS:

5					46				
6					47				
7					48				
8					49				
9					50				
10					51				
11					52				
12					53				
13					54				
14					55				
15					56				
16					57				
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38					78				
39					79				
40					80				

	0	15	30	45		0	15	30	45
0					41				
1					42				
2					43				
3					44				
4					45				

STATEMENT OF BASIS

Permit Reference Documents

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

- 1) Part 70 Operating Permit Renewal Application, received February 11, 2005;
- 2) 2004-2008 Emissions Inventory Questionnaires;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) St. Louis County Air Pollution Control Program Construction/Operating Permit 5130;
- 5) St. Louis County Air Pollution Control Program Construction/Operating Permit 6372;
- 6) St. Louis County Air Pollution Control Program Construction/Operating Permit 6583;
- 7) St. Louis County Air Pollution Control Program Construction/Operating Permit 7244.

Applicable Requirements Included in the Operating Permit but Not in the Application

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

None.

Construction Permit Revisions

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

St. Louis County Air Pollution Control Program Construction Permits 5130 and 6583: These construction permits were modified to more accurately describe the permitted emission units and associated control devices.

NSPS Applicability

No 40 CFR Part 60 standards apply to this installation.

Subpart Dc, *Standards of Performance for Small Industrial/Commercial/Institutional Steam Generating Units*

This regulation does not apply to the boiler at this installation, because they have a heat input rating of less than 10 mmBtu/hr.

Subpart JJJJ, *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines* This subpart does not apply to the emergency generator on site because it was manufactured prior to January 1, 2009. (40 CFR 60.4230(a)(4)(iv) and 40 CFR 60.4230(a)(4)(iii))

MACT Applicability

Subpart MMMM, *National Emission Standards for the Surface Coating of Miscellaneous Metal Parts*

This regulation applies to this facility as indicated in the permit. Beltservice is exempt from the Rubber-to-Metal Coating Subcategory of this regulation since the volume of product used does not exceed 50 gallons per year of a single coating and 250 gallons per year of total coatings.
(63.3881(c)(3))

Subpart OOOO, *National Emission Standards for Printing, Coating, and Dyeing of Fabrics and Other Textiles*

This regulation applies to this facility as indicated in the permit. Beltservice demonstrates initial compliance with the regulation (§63.4330 and §63.4331) in the Notification of Compliance Status (NOCS) received on July 2, 2007. In this NOCS, Beltservice explains several assumptions or interpretations made in applying this regulation.

Subpart PPPP, *National Emission Standards for the Surface Coating of Plastic Parts and Products*

This regulation does not apply to this facility. Beltservice submitted an initial notification for this subpart in February of 2005. Since the initial notification was made, methyl ethyl ketone (MEK) has been removed from the list of hazardous air pollutants. Since MEK is no longer considered a HAP, the plastic coating operations contain no HAP and contained no HAP on the compliance date. Therefore, this facility is not subject to this regulation.

NESHAP Applicability

40 CFR Part 61, Subpart M, *National Emission Standard for Asbestos*, applies to the installation because of the renovation and demolition sections of the subpart, which makes the subpart applicable to all sources. It is included as a core permit requirement.

Other Regulatory Determinations

10 CSR 10-5.455, *Control of Emissions from Solvent Cleanup Operations*

This installation currently does not emit greater than 500 pounds of cleaning solvent VOCs per day; therefore, this regulation does not apply.

Calculations

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

EU0010 – Rubber Belt Grinding Machines (CD-1)

Limit:

$$E = 4.10P^{0.67}$$

$$P = 728 \text{ lbs/hr} / 2000 \text{ lb/ton} = 0.364 \text{ tons/hr}$$

$$E = 2.083 \text{ lbs particulate matter/hr}$$

EU0020 – Rubber Belt Grinding Machines (CD-2)

Limit:

$$E = 4.10P^{0.67}$$

$$P = 9680 \text{ lbs/hr} / 2000 \text{ lb/ton} = 4.84 \text{ tons/hr}$$

$$E = 11.79 \text{ lbs particulate matter/hr}$$

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

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one (1) 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 (1) 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 St. Louis County Air Pollution Control Program and the Missouri Department of Natural Resources Air Pollution Control Program 's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation, which was not previously cited, the installation shall submit to the St. Louis County Air Pollution Control Program and the Missouri Department of Natural Resources Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Drafted by Jennifer Phillips, Air Emission Specialist
St. Louis County Air Pollution Control Program

Reviewed by:

Jason Dickneite
Environmental Engineer