

**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES  
Air Pollution Control Program

## PART 70 PERMIT TO OPERATE

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

**Operating Permit Number:** OP2017-058  
**Expiration Date:** JUL 24 2022  
**Installation ID:** 097-0132  
**Project Number:** 2016-05-030

**Installation Name and Address**

Bemis Packaging, Inc.  
3210 North Progress Avenue  
Joplin, MO 64801  
Jasper County

**Parent Company's Name and Address**

Bemis Company, Inc.  
One Neenah Center, P.O. Box 668  
Neenah WI, 54957

**Installation Description:**

Bemis Packaging, Inc. (formerly Milprint Packaging, LLC) manufactures flexible packaging for food and pharmaceutical operations in Joplin, Missouri. Process operations include flexographic printing, rotogravure printing, adhesive lamination, corona treatment, extrusion lamination, and natural gas-fired drying systems. An Oxidation System is used to control VOC and HAP emissions. The installation is a major source of volatile organic compound (VOC) emissions for the Title V Program and has established area source limits on hazardous air pollutant (HAP) emissions and synthetic minor limits on VOC for the Prevention of Significant Deterioration (PSD) program.

Prepared by  
Kasia Wasescha  
Operating Permit Unit

Director or Designee  
Department of Natural Resources

JUL 24 2017

Effective Date

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## I. Plant Wide Emission Limitations

### EMISSION UNITS WITH LIMITATIONS

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

Emission Unit	Description	Control Device
EP-01	Flexographic Press (JF-1): 8-color flexographic press with natural gas-fired drying system	EP-11 (oxidizer)
EP-02	Rotogravure Press (JR-1): 10-color rotogravure press with natural gas-fired drying system	
EP-06	Rotogravure Press (JR-2): 9-color rotogravure press with natural gas-fired drying system	
EP-08	Tandem Extrusion Laminator (JE-1): Extrusion laminator including two coating/printing decks with natural gas-fired drying system	
EP-08B	Tandem Extrusion Laminator (JE-1): Third coating/printing deck for extrusion laminator, with natural gas-fired drying system	Permanent Enclosure; EP-11 (oxidizer)
EP-10	Extrusion Coater Laminator (JE-2) with a natural gas-fired drying system	EP-11 (oxidizer)
EP-11	Oxidation System: Consisting of three catalytic oxidizers (EP-11A, EP-11B, and EP-11C) and one Regenerative Thermal Oxidizer (EP-11D)	-
EP-13	Central Impression Flexographic Printing Press (JF-2) with natural gas-fired drying system	Permanent Enclosure; EP-11 (oxidizer)
EP-14	Tandem Extrusion Laminator (JE-3) with natural gas-fired drying system	
EP-15	Tandem Extrusion Laminator (JE-4) with natural gas-fired drying system	
EP-16	Caterpillar 3054C Emergency Generator (diesel)	-
EP-19	Cummins Power Generation 60GGHE Emergency Generator (natural gas)	-
T-1, T-2, T-3	Above Ground Tank Farm (3 Tanks, 8000 gallons)	-

### EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

Emission Unit	Description of Emission Point
EP-04	Solventless Adhesive Laminator (JA-2)
EP-05	Parts Washer Operations and Solvent Storage
EP-12	Miscellaneous Natural Gas Combustion: 16 heating units with aggregate 26.5 MMBtu/hr capacity
EP-17	Paved Haul Roads
EP-18	Plastic Pellet Rail Receiving
-	Corona Treaters
-	Resin Pellet Storage Silos (8)
-	Raw Material Storage and Mixing Rooms
-	Waste Storage and Mixing Areas
-	Laser Perforation Unit
-	Die Exhaust
-	Trim Chopper/Compaction Systems
-	55 Gallon Fuel Tank of #2 Fuel Oil

## 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 10-6.060 Construction Permits Required  
Construction Permit 022004-008A, Issued October 3, 2011  
Construction Permit 082012-005, Issued August 13, 2012

#### **Operational Limitations:**

- 1) The permittee shall keep the coatings, inks, solvents, and cleaning solutions in sealed containers whenever the materials are not in use. [082012-005, Special Condition 6]
- 2) The permittee shall provide and maintain suitable, easily read, permanent or affixed markings on all VOC and HAP containing ink, solvent, and cleaning solution containers used with the equipment while the containers are in use. [022004-008A, Special Condition 4]

#### **Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
- 2) The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of 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.

<b>PERMIT CONDITION 001</b>	
10 CSR 10-6.060 Construction Permits Required Construction Permit 082012-005A, Issued March 29, 2013	
<b>Emission Unit</b>	<b>Description</b>
EP-01	Flexographic Press (JF-1): 8-color flexographic press with natural gas-fired drying system
EP-02	Rotogravure Press (JR-1): 10-color rotogravure press with natural gas-fired drying system
EP-04	Solvent-less Adhesive Laminator (JA-2)
EP-05	Parts Washer Operations and Solvent Storage
EP-06	Rotogravure Press (JR-2): 9-color rotogravure press with natural gas-fired drying system
EP-08	Tandem Extrusion Laminator (JE-1): Extrusion laminator including two coating/printing decks with natural gas-fired drying system
EP-08B	Tandem Extrusion Laminator (JE-1): Third coating/printing deck for extrusion laminator, with natural gas-fired drying system
EP-10	Extrusion Coater Laminator (JE-2) with a natural gas-fired drying system
EP-11	Oxidation System: Consisting of three catalytic oxidizers (EP-11A, EP-11B, and EP-11C) and one Regenerative Thermal Oxidizer (EP-11D)
EP-12	Miscellaneous Natural Gas Combustion
T-1, T-2, T-3	Above Ground Tank Farm (3 tanks)
EP-13	Central Impression Flexographic Printing Press (JF-2) with natural gas-fired drying system
EP-14	Tandem Extrusion Laminator (JE-3) with natural gas-fired drying system
EP-15	Tandem Extrusion Laminator (JE-4) with natural gas-fired drying system
EP-16	Caterpillar 3054C Emergency Generator (diesel)

**Emission Limitations:**

The permittee shall emit less than 250.0 tons of VOC in any consecutive rolling 12-month period from all VOC emission units of this permit condition. (Table 5 of Construction Permit 082012-005A) [Special Condition 2.A]

**Monitoring/Recordkeeping:**

- 1) The records shall track the emissions of VOC from the each emission unit using Attachment B or an equivalent. [Special Condition 2.B]
- 2) The form records shall use 90 percent capture efficiency for emission units not equipped with permanent total enclosure and 100 percent capture efficiency for units with permanent total enclosure. The control (destruction) efficiency shall be obtained from the latest oxidizer performance testing results. [Special Condition 2.C]
  - a) When an emission unit is applying solvent-less coating or material and exhausting to atmosphere, the VOC capture and control efficiency associated with that emission unit are each

zero. For this installation, solvent-less is defined as coatings or materials containing VOC less than 1 percent by weight as applied. [Special Condition 2.C.1]

- b) Emission units, such as natural gas combustion, where the emissions are not routed to a control device shall not include control efficiency. [Special Condition 2.C.2]
- 3) The permittee shall maintain all records for not less than five years and shall make them available to any Missouri Department of Natural Resources' personnel upon request. These records shall include Safety Data Sheets (SDS) or Certified Product Data Sheets (CPDS) for all materials used. [Special Condition 4.A]

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records show an exceedance of the VOC limit. [Special Condition 4.B]
- 2) The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 002</b>	
10 CSR 10-6.060 Construction Permits Required Construction Permit 082012-005A, Issued March 29, 2013	
<b>Emission Unit</b>	<b>Description</b>
EP-08	Tandem Extrusion Laminator (JE-1): Extrusion laminator including two coating/printing decks with natural gas-fired drying system
EP-08B	Tandem Extrusion Laminator (JE-1): Third coating/printing deck for extrusion laminator, with natural gas-fired drying system
EP-10	Extrusion Coater Laminator (JE-2) with a natural gas-fired drying system
EP-11	Oxidation System: Consisting of three catalytic oxidizers (EP-11A, EP-11B, and EP-11C) and one Regenerative Thermal Oxidizer (EP-11D)
EP-12	Miscellaneous Natural Gas Combustion
EP-13	Central Impression Flexographic Printing Press (JF-2) with natural gas-fired drying system
EP-14	Tandem Extrusion Laminator (JE-3) with natural gas-fired drying system
EP-15	Tandem Extrusion Laminator (JE-4) with natural gas-fired drying system
EP-16	Caterpillar 3054C Emergency Generator (diesel)

**Emission Limitations:**

The permittee shall emit less than 10.0 tons individually and less than 25.0 tons combined of HAPs in any consecutive rolling 12-month period from all HAP emitting emission units of this permit condition. (Table 6 from Construction Permit 082012-005A) [Special Condition 3.A]

**Monitoring/Recordkeeping:**

- 1) The permittee shall track HAP emissions from each emission unit using Attachment C1 and Attachment C2, or an equivalent: [Special Condition 3.B]
- 2) The permittee shall maintain all records for not less than five years and shall make them available to any Missouri Department of Natural Resources' personnel upon request. These records shall include Safety Data Sheets (SDS) or Certified Product Data Sheets (CPDS) for all materials used. [Special Condition 4.A]

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records show an exceedance of the HAP limit. [Special Condition 4.B]
- 2) The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 003</b>	
10 CSR 10-6.060 Construction Permits Required Construction Permit 082012-005, Issued August 13, 2012 40 CFR Part 64, Compliance Assurance Monitoring (CAM)	
<b>Emission Unit</b>	<b>Description</b>
EP-01	Flexographic Press (JF-1): 8-color flexographic press with natural gas-fired drying system
EP-02	Rotogravure Press (JR-1): 10-color rotogravure press with natural gas-fired drying system
EP-06	Rotogravure Press (JR-2): 9-color rotogravure press with natural gas-fired drying system
EP-08	Tandem Extrusion Laminator (JE-1): Extrusion laminator including two coating/printing decks with natural gas-fired drying system
EP-08B	Tandem Extrusion Laminator (JE-1): Third coating/printing deck for extrusion laminator, with natural gas-fired drying system
EP-10	Extrusion Coater Laminator (JE-2) with a natural gas-fired drying system
EP-11	Oxidation System: Consisting of three catalytic oxidizers (EP-11A, EP-11B, and EP-11C) and one Regenerative Thermal Oxidizer (EP-11D)
EP-13	Central Impression Flexographic Printing Press (JF-2) with natural gas-fired drying system
EP-14	Tandem Extrusion Laminator (JE-3) with natural gas-fired drying system
EP-15	Tandem Extrusion Laminator (JE-4) with natural gas-fired drying system

**Operational Limitations:**

- 1) Capture Device Requirement- Permanent Total Enclosure:
  - a) The permittee shall operate each of the emission units in Table 1 (Table 1 of Construction Permit 082012-005) within a permanent total enclosure such that all emissions associated with the laminating, coating, and printing operations are captured and exhausted to the Oxidation System (EP-11). [Construction Permit 082012-005, Special Condition 4.A]

Table 1: Emission Units with Permanent Total Enclosures

<b>Emission Unit<sup>1</sup></b>	<b>Description</b>
EP-08B	Tandem Extrusion Laminator (JE-1): Third coating/printing deck for extrusion laminator, with natural gas-fired drying system
EP-13	Central Impression Flexographic Printing Press (JF-2) with natural gas-fired drying system
EP-14	Tandem Extrusion Laminator (JE-3) with natural gas-fired drying system
EP-15	Tandem Extrusion Laminator (JE-4) with natural gas-fired drying system

<sup>1</sup> Emission Unit IDs have been changed from the construction permit to match the IDs in the EIQ.



- b) Operation of permanent total enclosure is not required during application of solvent-less coating or materials. [Construction Permit 082012-005, Special Condition 4.B]
- 2) Control Device Requirement – Oxidation System:
  - a) The Oxidation System (EP-11) must be in use at all times when any of the emission units listed in Table 2 (Table 2 of Construction Permit 082012-005) are in operation [Construction Permit 082012-005, Special Condition 5.A]

Table 2: Emission Units Controlled by the Oxidation System and Capable of Applying Solventless Material

Emission Unit <sup>1</sup>	Description
EP-01	Flexographic Press (JF-1): 8-color flexographic press with natural gas-fired drying system
EP-02	Rotogravure Press (JR-1): 10-color rotogravure press with natural gas-fired drying system
EP-06	Rotogravure Press (JR-2): 9-color rotogravure press with natural gas-fired drying system
EP-08	Tandem Extrusion Laminator (JE-1): Extrusion laminator including two coating/printing decks with natural gas-fired drying system
EP-08B	Tandem Extrusion Laminator (JE-1): Third coating/printing deck for extrusion laminator, with natural gas-fired drying system
EP-10	Extrusion Coater Laminator (JE-2) with a natural gas-fired drying system
EP-13	Central Impression Flexographic Printing Press (JF-2) with natural gas-fired drying system
EP-14	Tandem Extrusion Laminator (JE-3) with natural gas-fired drying system
EP-15	Tandem Extrusion Laminator (JE-4) with natural gas-fired drying system

- b) The Oxidation System (EP-11) shall be operated and maintained in accordance with the manufacturer’s specifications to ensure a minimum VOC destruction efficiency of 95% and a minimum overall control efficiency of 85.5%.
- c) The permittee may emit directly to the ambient air uncontrolled emissions from emission units in Table 2 during solvent-less coating or material application. [Construction Permit 082012-005, Special Condition 5.B]
- d) The total exhaust flow rate in dry standard cubic feet per minute (DSCFM) from all operating emission units in Table 2 shall not exceed the total flow rated capacity in DSCFM of all operating oxidizers in the oxidation system. [Construction Permit 082012-005, Special Condition 5.C]
- 3) Use of Alternative Coating in EP-08B, EP-13, EP-14, and EP-15:
  - a) When considering using an alternative coating, ink or solvent in EP-08B, EP-13, EP-14 and/or EP-15 that is different than the material listed in the Application for Authority to Construct for Construction Permit No. 082012-005, the permittee shall calculate the potential emissions of all individual HAP in the alternative material. [Construction Permit 082012-005, Special Condition 9.A]
  - b) The permittee shall seek approval from the Air Pollution Control Program before use of the alternative material if the potential individual HAP emissions for the alternative material are equal to or greater than the screening model action level (SMAL) for any chemical contained in the alternative material. The SMAL values can be found at the following website: <http://www.dnr.mo.gov/env/apcp/docs/cp-hapraltbl6.pdf>. [Construction Permit 082012-005, Special Condition 9.B]

**Monitoring/Recordkeeping:**

- 1) The permittee shall use Attachment E or an equivalent to maintain records of all solvent-less coating or materials applied including names, monthly usage amount, date and time. [Construction Permit 082012-005, Special Condition 4.B]
- 2) The permittee shall use Attachment A, or equivalent forms, such as electronic forms approved by the Air Pollution Control Program, shall be used to show compliance with the use of alternative coatings. [Construction Permit 082012-005, Special Condition 9.C]
- 3) The permittee shall use Attachment D or an equivalent to maintain an operating and maintenance log associated with each permanent total enclosure which shall include the following: [Construction Permit 082012-005, Special Condition 4.D]
  - a) Incidents of malfunction, with impact on emissions, time, date and duration of event, probable cause, and corrective actions; and
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 4) The permittee shall comply with the VOC capture system monitoring, corrective action, recordkeeping and reporting provisions outlined in the CAM Plan for Permanent Total Enclosure connected to the Oxidation System for emission units EP-08B, EP-13, EP-14 and EP-15.
- 5) The permittee shall verify that each enclosure for emission units EP-08B, EP-13, EP-14 and EP-15 meets the definition of Permanent Total Enclosure using the applicable procedures described in US EPA Method 204.
- 6) The permittee shall comply with the VOC capture system monitoring, corrective action, recordkeeping, and reporting provisions outlined in the CAM Plan for Unenclosed Presses connected to the Oxidation System for emission units EP-01, EP-02, EP-06, EP-08 and EP-10.
- 7) The oxidizers that are in operation shall be continuously monitored individually and recorded at least once every 15 minutes of operation. [Construction Permit 082012-005, Special Condition 5.C.1]
- 8) The emission units in Table 2 that are in operation and exhausting to the Oxidation System shall be continuously monitored and recorded at least once every 15 minutes of operation. [Construction Permit 082012-005, Special Condition 5.C.2]
- 9) Pressure in the common emission unit exhaust shall be continuously monitored and recorded at least once every 15 minutes of operation to verify negative pressure. [Construction Permit 082012-005, Special Condition 5.C.3]
- 10) The permittee shall maintain all records for not less than five years and shall make them available to any Missouri Department of Natural Resources' personnel upon request. These records shall include Safety Data Sheets (SDS) or Certified Product Data Sheets (CPDS) for all materials used. [Construction Permit 082012-005, Special Condition 7.A]

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation. [Construction Permit 082012-005, Special Condition 7.B]
- 2) The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 004</b>	
10 CSR 10-6.060 Construction Permits Required Construction Permit 022004-008A, Issued October 3, 2011 Construction Permit 082012-005, Issued August 13, 2012 40 CFR Part 64, Compliance Assurance Monitoring (CAM)	
Emission Unit	Description
EP-11	Catalytic Thermal Oxidizer System: Consisting of three catalytic oxidizers (EP-11A, EP-11B, and EP-11C) and one Regenerative Thermal Oxidizer (EP-11D)

**Operational Limitations:**

- 1) Each oxidizer in the Oxidation System shall be operated and maintained in accordance with the manufacturer's specifications and operational ranges established in the latest oxidizer performance test and latest Compliance Assurance Monitoring (CAM) Plan. [082012-005, Special Condition 5.D.1 and 5.E]
- 2) Catalytic Oxidizers (EP-11A, EP-11B, and EP-11C):
  - a) The catalytic oxidizers shall maintain an average operating temperature for all three-hour periods of operation that is no greater than 50°F below the catalytic oxidizer control set point temperature established during the most recent performance test which demonstrated compliance. [CAM]
  - b) At least once per calendar year a representative catalyst core sample from the catalyst chamber of each oxidizer shall be analyzed for catalyst activity. Samples respective to a single oxidizer may not be taken within four months of each other. If the analysis indicates the catalyst activity is not sufficient to achieve at least 95.0 percent VOC destruction efficiency, the permittee shall: [082012-005, Special Condition 5.D.2]
    - i) Raise the oxidizer inlet control temperature to a level that will indicate compliance and retest the VOC destruction efficiency of the oxidizer, or
    - ii) Replace the catalyst and retest the VOC destruction efficiency of the oxidizer.
    - iii) Whenever action is taken as a result of the catalyst activity analysis, a report of the sampling event, analysis and resulting action shall be submitted to the Director within 30 days of the completion of the resulting action. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete calculations.
- 3) Regenerative Thermal Oxidizer (EP-11D):
  - a) The RTO shall maintain an average combustion zone temperature for all three-hour periods of operation that is no greater than 50°F below the RTO control set point temperature established during the most recent performance test which demonstrated compliance. [CAM]

**Monitoring/Recordkeeping:**

- 1) The permittee shall use Attachment D or an equivalent to maintain an operating and maintenance log for the oxidation system which shall include the following: [082012-005, Special Condition 5.F; 022004-008A, Special Condition 3.A]
  - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements.
- 2) The permittee shall install, calibrate, certify, operate and maintain, according to the manufacturer's specifications, a continuous temperature monitoring system as specified below: [CAM]

- a) The continuous temperature monitoring system shall be in operation whenever the oxidizers are in use and controlling process emissions.
  - b) The device shall be capable of monitoring temperature with an accuracy of  $\pm 0.5$  percent of the temperature being monitored in degrees Celsius, or  $\pm 5$  degrees Celsius whichever is greater.
  - c) For catalytic oxidizers (EP-11A, EP-11B, and EP-11C) the thermocouple or temperature sensor for measuring the catalyst bed inlet temperature shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.
  - d) For the RTO (EP-11D) the thermocouple or temperature sensors for measuring the combustion zone temperature shall be installed in the burner section and the tops of the ceramic media to determine the highest temperature in the unit.
  - e) The permittee may modify or change the continuous temperature monitoring system upon demonstrating to the Director's satisfaction that the alternative monitoring system demonstrates continuous compliance with the temperature monitoring requirements described above.
- 3) The permittee shall keep an up-to-date, readily accessible record of the continuous temperature monitoring data.
  - 4) The permittee shall maintain all records, including specifications and operating ranges, for no less than five years and shall make them available to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) or Certified Product Data Sheets (CPDS) for all materials used. [082012-005, Special Condition 7.A]

**Compliance Assurance Monitoring Requirements:**

Refer to Attachment F for CAM requirements for Catalytic Oxidizers and Regenerative Thermal Oxidizers.

**Performance Testing Requirements:**

- 1) The permittee shall conduct at least one performance test on each oxidizer in the Oxidation System that demonstrate at least 95% VOC destruction by weight in accordance with Methods 1 through 4 and 25A of 40 CFR Part 60, Appendix A. [082012-005, Special Condition 8.A]
- 2) The permittee shall conduct additional performance tests as described in the CAM Plan for the Oxidation System.
- 3) The test protocol and testing schedule shall be pre-approved by the Missouri Air Pollution Control Compliance/Enforcement Section.
- 4) Records of performance tests shall be maintained for a minimum of five years or until a new test is performed, whichever is longer. All other records shall be maintained for a minimum of five years.
- 5) All records shall be made available immediately for inspection to Missouri Department of Natural Resources' personnel upon request.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which any record shows an exceedance of a limitation from this permit condition. [082012-005, Special Condition 7.B]
- 2) The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 005</b>	
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63 Subpart KK, National Emission Standards for the Printing and Publishing Industry	
Emission Unit	Description
EP-01	Flexographic Press (JF-1): 8-color flexographic press with natural gas-fired drying system
EP-02	Rotogravure Press (JR-1): 10-color rotogravure press with natural gas-fired drying system
EP-06	Rotogravure Press (JR-2): 9-color rotogravure press with natural gas-fired drying system
EP-13	Central Impression Flexographic Printing Press (JF-2) with natural gas-fired drying system

**Emission Limitations:**

For each product and packaging rotogravure or wide-web flexographic printing affected source the permittee shall limit organic HAP emissions to no more than five percent of the organic HAP applied for the month; or to no more than four percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners and other materials applied for the month; or to no more than 20% of the mass of solids applied for the month; or to a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month. [§63.825(b)]

**Compliance Demonstration Options:**

The permittee shall demonstrate compliance with this standard by following one of the procedures below: [§63.825(a)]

- 1) Demonstrate that each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner and other material applied during the month contains no more than 0.04 weight fraction organic HAP, on an as-purchased basis, as determined in accordance with 2) below. [§63.825(b)(1)]
- 2) Demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied during the month contains no more than 0.04 weight-fraction organic HAP, on a monthly average as-applied basis as determined in accordance with 2(a) and 2(b) below. The permittee shall calculate the as-applied HAP content of materials which are reduced, thinned, or diluted prior to application, as follows: [§63.825(b)(2)]
  - a) Determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied on an as-purchased basis in accordance with §63.827(b)(2). [§63.825(b)(2)(i)]
  - b) Calculate the monthly average as-applied organic HAP content,  $C_{ahi}$ , of each ink, coating, varnish, adhesive, primer, and other solids-containing material using Equation 3:  
 [§63.825(b)(2)(ii)]
 
$$C_{ahi} = \frac{(C_{hi}M_i + \sum_{j=1}^q C_{hij}M_{ij})}{M_i + \sum_{j=1}^q M_{ij}} \quad (\text{Eq. 3})$$
  - c) Determine that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied either: [§63.825(b)(3)(i)]
    - i. Contains no more than 0.04 weight-fraction organic HAP on a monthly average as-applied basis, or [§63.825(b)(3)(i)(A)]

- ii. Contains no more than 0.20 kg of organic HAP per kg of solids applied, on a monthly average as-applied basis. [§63.825(b)(3)(i)(B)]
- 3) Demonstrate that the monthly average as-applied organic HAP content,  $H_L$ , of all materials applied is less than 0.04 kg HAP per kg of material applied as determined by Equation 6: [§63.825(b)(4)]

$$H_L = \frac{\sum_{i=1}^p M_i C_{hi} + \sum_{j=1}^q M_j C_{hj}}{\sum_{i=1}^p M_i + \sum_{j=1}^q M_j} \quad (\text{Eq. 6})$$

- 4) Demonstrate that the monthly average as-applied organic HAP content on the basis of solids applied,  $H_s$ , is less than 0.20 kg HAP per kg solids applied as determined by Equation 7: [§63.825(b)(5)]

$$H_s = \frac{\sum_{i=1}^p M_i C_{hi} + \sum_{j=1}^q M_j C_{kj}}{\sum_{i=1}^p M_i C_{si}} \quad (\text{Eq. 7})$$

- 5) Demonstrate that the total monthly organic HAP applied,  $H_{app}$ , as determined by Equation 8, is less than the calculated equivalent allowable organic HAP,  $H_a$ , as determined by Equation 17: [§63.825(b)(5)]

$$H_{app} = \sum_{i=1}^p M_i C_{hi} + \sum_{j=1}^q M_j C_{hj} \quad (\text{Eq. 8})$$

$$H_a = 0.20 \left[ \sum_{i=1}^p M_i G_i C_{si} \right] + 0.04 \left[ \sum_{i=1}^p M_i (1 - G_i) + \sum_{j=1}^q M_{Ij} \right] \quad (\text{Eq. 17})$$

### **Performance Testing:**

Performance tests shall be conducted under such conditions as the Administrator specifies to the permittee based on representative performance of the affected source for the period being tested. Upon request, the permittee shall make available to the Director such records as may be necessary to determine the conditions of performance tests. The permittee shall conduct performance tests using the methods and criteria as required by §63.827.

### **General Provisions:**

The permittee shall comply with the applicable General Provisions in §§60.1 through 63.15 as listed in Table 1 to MACT KK.

### **Recordkeeping:**

- 1) The permittee shall maintain records of all liquid-liquid material balances performed in accordance with the requirements of §63.825 of MACT KK. The records shall be maintained in accordance with the requirements of §63.10(b). [§63.829(c)]
- 2) The permittee shall maintain records of all required measurements and calculations needed to demonstrate compliance, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP-containing material used, on a monthly basis. [§63.829(d)]
- 3) If the permittee chooses to exclude from an affected source, a product and packaging rotogravure or wide-web flexographic press which meets the limits and criteria of §63.821(a)(2)(ii)(A), the permittee shall maintain the following records for at least five years: [§63.829(f)]
  - a) The total mass of each material applied each month on the press, including all inboard and outboard stations, and [§63.829(f)(1)]
  - b) The total mass of each material applied each month on the press by product and packaging rotogravure or wide-web flexographic printing operations. [§63.829(f)(2)]
- 4) The permittee shall maintain records of the occurrence and duration of each malfunction of operation, air pollution control equipment or monitoring equipment. [§63.829(g)]
- 5) The permittee shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with §63.823(b), including corrective actions to restore malfunctioning

process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.829(h)]

**Reporting:**

- 1) The permittee shall submit the reports specified below: [§63.830(b)]
  - a) An initial notification required in §63.9(b). [§63.830(b)(1)]
  - b) A Notification of Compliance Status specified in §63.9(h) of this part. Performance test reports specified in §63.10(d)(2) of this part. [§63.830(b)(2)]
  - c) A summary report specified in §63.10(e)(3) of Part 63 shall be submitted on a semi-annual basis. These summary reports are required even if the affected source does not have any control devices or does not take the performance of any control devices into account in demonstrating compliance with the emission limitations. In addition to a report of operating parameter exceedances as required by §63.10(e)(3)(i), the summary report shall include, as applicable: [§63.830(b)(6)]
    - i) Exceedances of the standards in §63.825;
    - ii) Exceedances of either of the criteria of §63.820(a)(2);
    - iii) Exceedances of the criterion of §63.821(b)(1) and the criteria of §63.821(b)(2) in the same month
    - iv) Exceedances of the criterion of §63.821(a)(2)(ii)(A);
    - v) The number, duration and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emission in accordance with §63.823(b)(2), including actions taken to correct a malfunction.
- 2) All reports required by MACT KK not subject to the requirements in §63.830(c)(1) must be sent to the Administrator. If acceptable to both the Administrator and the permittee, these reports may be submitted electronically. [§63.830(c)(2)]
- 3) The permittee shall report to the Air Pollution Control Program’s Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
- 4) The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 006</b>	
10 CSR 10-6.070 New Source Performance Regulations	
40 CFR Part 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	
40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	
<b>Emission Unit</b>	<b>Description</b>
EP-16	72.4-hp diesel-fueled Caterpillar 3054C Emergency Generator; Installed 1/1/12

**Emission Limitations:**

- 1) The permittee must comply with the emission standards for new non-road CI engines in §60.4202, for all pollutants, for the same model year and maximum engine power. [§60.4205(b)]

- 2) The permittee shall meet the emission standards for new non-road CI engines for the same model year and maximum engine power in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants. [§60.4202(a)(1)(i)]
- 3) Exhaust opacity must not exceed 20% during the acceleration mode; 15% during the lugging mode; and 50% during the peaks in either the acceleration or lugging modes. Opacity levels are to be measured and calculated as set forth in 40 CFR Part 86, subpart I. [§60.4202(a)(2) and 89.113(a) and (b)]
- 4) The permittee must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for non-road diesel fuel. [§60.4207(b)]
  - a) Sulfur content : 15 ppm maximum for NR diesel fuel;
  - b) Cetane index or aromatic content
    - i) A minimum cetane index of 40; or
    - ii) A maximum aromatic content of 35 volume percent.
  - c) Existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010 may be used until depleted.

**Operational Limitations:**

- 1) The permittee must install a non-resettable hour meter if one is not already installed. [§60.4209(a)]
- 2) The permittee must operate the engine according to the following requirements or the engine will not be considered an emergency engine under NSPS III and must meet all requirements for non-emergency engines: [§60.4211(f)(1)-(2)]
  - a) There is no time limit on the use of the emergency generators in emergency situations; and
  - b) The permittee may operate the emergency generators for a maximum of 100 hours per calendar year during maintenance checks and readiness testing and emergency demand response.
- 3) The emergency generators may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response. The 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§60.4211(f)(3)]

**Compliance Requirements:**

- 1) The permittee must operate and maintain the emergency generators according to the manufacturer's emission-related written instructions. [§60.4211(a)(1)]
- 2) The permittee must comply with the emission limitations by purchasing an engine certified to the emission standards. The engine must be installed and configured according to the manufacturer's emission-related specifications. [§60.4211(c)]
- 3) The permittee is in compliance with MACT ZZZZ by meeting the requirements of NSPS III. [§63.6590(c)]

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.



- 2) The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 007</b>	
40 CFR Part 60 Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	
40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines	
<b>Emission Unit</b>	<b>Description</b>
EP-19	97.5-hp natural gas-fired Cummins Power Generation 60GGHE Emergency Generator, manufactured after July 2008, installed 2016

**Emission Limitations:**

- 1) The permittee shall: [§60.4233(d) and Table 1 of NSPS JJJJ]
- a) Limit the emissions of NO<sub>x</sub> + HC to less than 10 g/HP-hr.
  - b) Limit the emissions of CO to less than 387 g/HP-hr.

**Operational Limitation:**

- 1) The permittee must operate and maintain the stationary spark ignition (SI) internal combustion engine (ICE) that achieve the emission standards as required in §60.4233 over the entire life of the engine. [§60.4234]
- 2) The permittee must install a non-resettable hour meter upon startup of the emergency engine. [§60.4237(c)]

**Compliance Requirements:**

- 1) The permittee must demonstrate compliance according to the method specified below in 1(a): [§60.4243(b)]
- a) The engine must be certified according to procedures specified in NSPS JJJJ, for the same model year and demonstrating compliance according to the method specified in 2) below. [§60.4243(b)(1)]
- 2) The permittee must meet the requirements specified in 2(a) below: [§60.4243(a)]
- a) The permittee shall operate and maintain the certified stationary SI internal combustion engine and control device according to the manufacturer’s emission-related written instructions. They must keep records of conducted maintenance to demonstrate compliance. They must also meet the requirements as specified in 40 CFR part 1068, subparts A through D, as they apply. [§60.4243(a)(1)]
- 3) The permittee must operate the emergency stationary ICE according to the requirements listed below in 3(a) through (c). In order for the engine to be considered an emergency stationary ICE under Part 60, Subpart JJJJ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in 3(a) through (c), is prohibited. If you do not operate the engine according to the requirements in 3(a) through (c), the engine will not be considered an emergency engine under NSPS JJJJ and must meet all requirements for non-emergency engines. [§60.4243(d)]
- a) There is no time limit on the use of emergency stationary ICE in emergency situations. [§60.4243(d)(1)]

- b) The permittee may operate the emergency stationary ICE for any combination of the purposes specified below in 3(b)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by 3(c) counts as part of the 100 hours per calendar year allowed by 3(b). [§60.4243(d)(2)]
  - i) The emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. [§60.4243(d)(2)(i)]
- c) The emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in 3(c). Except as provided in 3(c)(i) below, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§60.4243(d)(3)]
- 4) The permittee may operate the emergency engine using propane for a maximum of 100 hours per year as an alternative fuel solely during emergency operations, but must keep records of such use. If propane is used for more than 100 hours per year in an engine that is not certified to the emission standards when using propane, the owners and operators are required to conduct a performance test to demonstrate compliance with the emission standards of §60.4233. [§60.4243(e)]
- 5) The permittee is in compliance with MACT ZZZZ by meeting the requirements of NSPS JJJJ. [§63.6590(c)]

**Recordkeeping:**

- 1) The permittee must meet the following notification, reporting, and recordkeeping requirements: [§60.4245]
  - a) The permittee must keep records of the information in 1(a)(i) through (iv) below. [§60.4245(a)]
    - i) All notifications submitted to comply with NSPS JJJJ and all documentation supporting any notification. [§60.4245(a)(1)]
    - ii) Maintenance conducted on the engine. [§60.4245(a)(2)]
    - iii) If the stationary SI internal combustion engine is a certified engine, documentation from the manufacturer that the engine is certified to meet the emission standards and information as required in 40 CFR parts 90, 1048, 1054, and 1060, as applicable. [§60.4245(a)(3)]
    - iv) If the stationary SI internal combustion engine is not a certified engine or is a certified engine operating in a non-certified manner and subject to §60.4243(a)(2), documentation that the engine meets the emission standards. [§60.4245(a)(4)]

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.

- 2) The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.

<b>PERMIT CONDITION 008</b>	
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds	
<b>Emission Unit</b>	<b>Description</b>
EP-16	Caterpillar 3054C Emergency Generator: 72.4-hp diesel generator; Installed 1/1/12

*Note: 10 CSR 10-6.260 is currently federally enforceable only<sup>2</sup>*

**Emission Limitation:**

- 1) Emissions from any new source operation shall not contain more than five hundred parts per million by volume (500 ppm<sub>v</sub>) of sulfur dioxide.
- 2) Stack gases shall not contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.

**Operational Limitation/Equipment Specifications:**

When burning number 2 fuel oil (diesel fuel) these units are limited to burning fuel with a sulfur content less than 0.1%.

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain an accurate record of the sulfur content of fuel used. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable. Fuel oil samples taken by the permittee shall be conducted following delivery of the shipment or lot to the bulk storage facilities. All records shall be maintained for five (5) years. They shall be kept onsite for at least two (2) years. They may be kept in either hard-copy form or on computer media.
- 2) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
- 2) The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.

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<sup>2</sup> This regulation was rescinded by the State of Missouri on November 30, 2015. The regulation remains in this operating permit as it is contained in Missouri's SIP and remains an applicable federal 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 incorporation of 10 CSR 10-6.261 into Missouri's SIP.

<b>PERMIT CONDITION 009</b>	
10 CSR 10-6.261 Control of Sulfur Dioxide Emissions	
<b>Emission Unit</b>	<b>Description</b>
EP-16	Caterpillar 3054C Emergency Generator: 72.4-hp diesel generator; Installed 1/1/12

*Note: 10 CSR 10-6.261 is currently state enforceable only<sup>3</sup>*

**Emission Limitation:**

Fuel sulfur content from any new source operation shall not contain more than 8,812 parts per million (ppm<sub>v</sub>) of sulfur for distillate fuel and 8,509 parts per million (ppm<sub>v</sub>) for residual fuel.

**Monitoring/Recordkeeping:**

- 1) The permittee shall determine compliance using fuel delivery records, fuel sampling and analysis, performance tests, continuous emission monitoring, or other compliance methods approved by the staff director and the U.S. Environmental Protection agency and incorporated into the state implementation plan.
- 2) The permittee must report any excess emissions other than startup, shutdown and malfunction excess emissions to the staff director for each calendar quarter within thirty (30) days following the end of the quarter. In all cases, the notification must be a written report and must include, at a minimum, the following:
  - a) Name and location of source;
  - b) Name and telephone number of person responsible for the source;
  - c) Identity and description of the equipment involved;
  - d) Time and duration of the period of excess emissions;
  - e) Type of activity;
  - f) Estimate of the magnitude of the excess emissions expressed in the units of the applicable emission control regulation and the operating data and calculations used in estimating the magnitude;
  - g) Measures taken to mitigate the extent and duration of the excess emissions;
  - h) Measures taken to remedy the situation which cause the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 3) The permittee must maintain a list of modifications to the source's operating procedures or other routine procedures instituted to prevent or minimize the occurrence of any excess emissions.
- 4) The permittee must maintain a record of data, calculations, results, records and reports from any performance test, continuous emission monitoring, fuel deliveries, and/or fuel sampling tests.
- 5) The permittee must maintain a record of any applicable monitoring data, performance evaluations, calibration checks, monitoring system and device performance tests, and any adjustments and maintenance performed on these systems or devices.
- 6) If the permittee is using fuel delivery records for compliance they must also maintain the fuel supplier certification information to certify all fuel deliveries. Bills of lading and/or other fuel deliver documentation containing the following information for all fuel purchases or deliveries are deemed acceptable to comply with the requirements of this rule:
  - a) The name, address, and contact information of the fuel supplier;

<sup>3</sup> 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.

- b) The type of fuel;
  - c) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur; and
  - d) The heating value of the fuel.
- 7) All required reports and records must be retained on-site for a minimum of five (5) years and made available within five (5) business days upon written or electronic request by the director.
- 8) The permittee must furnish the director all data necessary to determine compliance status.

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
- 2) The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring reports and annual compliance certification required by Section V of this permit.

## 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.

#### **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. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

#### **10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information**

- 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.
- 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.
- 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.

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

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

#### **10 CSR 10-6.150 Circumvention**

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

**10 CSR 10-6.165 Restriction of Emission of Odors**

**This requirement is not federally enforceable.**

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour. This odor evaluation shall be taken at a location outside of the installation's property boundary.

**10 CSR 10-6.170**

**Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**

**Emission Limitation:**

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

**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 10-6.280 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.

<b>40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)</b>
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- 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 (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 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**

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

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

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

no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

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

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

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.

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

None.

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
  - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:

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

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

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

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program, Compliance 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 Daniel Gau, Plant Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible

person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

#### **10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause**

This permit may be reopened for cause if:

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

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

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

## **VI. Attachments**

Attachments follow.



**Attachment A**

Alternative Coating Potential to Emit Compliance Worksheet  
*(From Construction Permit 082012-005)*

Bemis Packaging, Inc.  
 Jasper County, S30, T28N, R32W  
 Installation ID: 097-0132

This sheet covers EP-13, EP-14, or EP-15 (Circle one) for coating or material name \_\_\_\_\_ Date \_\_\_\_\_ sheet as needed.

(A)	(B)	(C)	(D)	(E)	(F)	(G)
Process and Emission Unit	Individual HAP Name and CAS No.	HAP is also Particulate Matter (yes/no)	Individual HAP Content (max weight %)	Coating Non-Volatiles (weight %)	Maximum Hourly Application Rate (lbs coating/hr)	Overall Control Efficiency (%)

- A. Record the process description and emission unit.
- B. Record the individual HAPs from this coating/material SDS.
- C. Compare the HAP to an up-to-date table of DNR's Hazardous Air Pollutants and Screaming Model Action Levels for verification as particulate matter. If the HAP is also particulate matter, and the coating is applied by rolling, the HAP potential emissions (H) are zero.
- D. Record the maximum weight percent of each HAP from the SDS.
- E. Record the coating's non volatile weight % from the SDS.
- F. Calculate the coating's maximum hourly application rate by multiplying the maximum reams per hour by the solids rate (lb/ream), divide by the coating's non-volatile percent mass. Example: 162.5 reams/hr x 1 lb solids/ream / (E) = 796.96 pounds coating per hour.
- G. Calculate the overall control efficiency by multiplying the capture efficiency by the control efficiency. For a permanent total enclosure use 100 percent capture efficiency. Use 95 percent control efficiency for the catalytic oxidizers. For solvent-less coatings use zero percent overall control efficiency.
- H. Calculate the HAP potential to emit.  $(H) = (D) \times (F) \times (1-(G)) \times 8,760 / 2,000$ .
- I. Record the Individual HAP SMAL as reported in an up-to-date table of DNR's Hazardous Air Pollutants and Screaming Model Action Levels. If the Individual HAP PTE is equal to or greater than the Individual HAP SMAL, seek approval from the Air Pollution Control Program New Source Review Unit before using this coating.

**Attachment B**  
**Monthly VOC Tracking Sheet**

This tracking sheet is for the period of \_\_\_\_\_ to \_\_\_\_\_.  
 (month, year) (month, year)

Materials Used <sup>4</sup> (Name, Type: Solvent/Ink/Extender)		Amount Used Monthly (gal)	Density <sup>5</sup> (lb/gal)	VOC Content <sup>6</sup> (%)	Overall Control Efficiency <sup>7</sup> (%)	Monthly VOC Emissions (tons)
Emission Point	Description	Monthly Throughput	Emission Factor	Source	Monthly VOC Emissions (tons)	
EP-11A, EP-11B, EP-11C, EP-11D	Oxidizer System (Natural Gas)	MMscf	5.5 lb/MMscf	SCC 10200603		
EP-12	Misc. Natural Gas Combustion	MMscf	5.5 lb/MMscf	SCC 10200603		
T-1, T-2, T-3	Above Ground Tank Farm	1000gal	2.3 lb/1000gal	SCC 40704406		
<b>Monthly Start-Up, Shutdown, and Malfunction (SSM) VOC Emissions<sup>8</sup> (tons/month):</b>						
<b>Monthly VOC Emissions (ton/month):</b>						
<b>12 Month Rolling Total VOC Emissions<sup>9</sup> (tons/year):</b>						

<sup>4</sup> Used for EP-01, EP-02, EP-04, EP-05, EP-06, EP-08, and EP-10.  
<sup>5</sup> From the SDS for the material. If specific gravity is provided instead, the density can be obtained by multiplying the specific gravity by 8.33.  
<sup>6</sup> From the SDS for the material. If a range of VOC contents is provided, the highest value in the range shall be used to demonstrate compliance.  
<sup>7</sup> 90% capture efficiency shall be used for emission units not equipped with permanent total enclosures and 100% capture efficiency for units with permanent total enclosures. The control (destruction) efficiency shall be obtained from the latest oxidizer performance testing results. 95% minimum destruction efficiency required for emission points fed to oxidizer system. Higher control efficiencies can be used if obtained from the most recent Air Pollution Control Program approved stack test. When using a solvent-less coating or material, VOC capture and control efficiency of that emission unit is 0%.  
<sup>8</sup> As reported to the Air Pollution Control Program's Compliance/Enforcement section for compliance with 10 CSR 10-6.050. SSM emissions should be calculated with an overall control efficiency of 0%.

**Attachment C1**  
**Monthly Total HAP Tracking Sheet**

This tracking sheet is for the period of \_\_\_\_\_ to \_\_\_\_\_.  
 (month, year) (month, year)

Materials Used <sup>10</sup> (Name, Type: Solvent / Ink / Extender)	Amount Used Monthly (gal)	Density <sup>11</sup> (lb/gal)	HAP (Name, CAS)	HAP Content <sup>12</sup> (%)	Overall Control Efficiency <sup>13</sup> (%)	SSM Emissions <sup>14</sup> (tons)	Monthly HAP Emissions (tons)
Emission Point <sup>15</sup>	Monthly Throughput (units)		HAP (Name, CAS)	Emission Factor <sup>16</sup>	Overall Control Efficiency (%)	SSM Emissions (tons)	Monthly HAP Emissions (tons)
<b>Sum of Monthly Start-Up, Shutdown, and Malfunction (SSM) Total HAP Emissions (tons/month):</b>							
<b>Sum of Monthly Total HAP Emissions (ton/month):</b>							
<b>12 Month Rolling Total HAP Emissions<sup>17</sup> (tons/year):</b>							

<sup>9</sup> Must be under 250.0 tons/year in order to be in compliance.  
<sup>10</sup> Used for EP-08, EP-08B, EP-10, EP-11, EP-13, EP-14, and EP-15  
<sup>11</sup> From the SDS for the material. If specific gravity is provided instead, the density can be obtained by multiplying the specific gravity by 8.33.  
<sup>12</sup> From the SDS for the material. If a range of HAP contents is provided, the highest values in the ranges shall be used to demonstrate compliance.  
<sup>13</sup> 90% capture efficiency shall be used for emission units that emit HAP-VOC not equipped with permanent total enclosures and 100% capture efficiency for units that emit HAP-VOC with permanent total enclosures. The control (destruction) efficiency shall be obtained from the latest oxidizer performance testing results. 95% minimum destruction efficiency required for emission points fed to oxidizer system for HAP-VOCs. Higher control efficiencies can be used if obtained from the most recent Air Pollution Control Program approved stack test. When using a solvent-less coating or material, HAP-VOC capture and control efficiency of that emission unit is 0%.  
<sup>14</sup> Monthly Start-Up, Shutdown, and Malfunction (SSM) Emissions. As reported to the Air Pollution Control Program's Compliance/Enforcement section for compliance with 10 CSR 10-6.050. SSM emissions should be calculated with an overall control efficiency of 0%.  
<sup>15</sup> Used for the natural gas-fired dryers for EP-08, EP-08B, EP-10, EP-14, and EP-15. Also used for EP-11A, EP-11B, EP-11C, EP-11D, EP-12, and EP-16.  
<sup>16</sup> Emission factor source should be SCC 10200603 for natural gas-fired units and SCC 20200102 for the diesel emergency engine.  
<sup>17</sup> Must be under 25.0 tons/year in order to be in compliance.

**Attachment C2**  
**Monthly Individual HAP Tracking Sheet**

Take the HAP emissions calculated from each material used/emission point in Attachment C1 (including SSM emissions) and sum up each individual HAP below.

This tracking sheet is for the period of \_\_\_\_\_ to \_\_\_\_\_.  
(month, year) (month, year)

<b>Individual HAP (Name, CAS)</b>	<b>Monthly Individual HAP Emissions (tons/month)</b>	<b>12-Month Rolling for Individual HAP Emissions<sup>18</sup> (tons/year)</b>

<sup>18</sup> 12-Month Rolling Total for each HAP should be less than 10.0 tons/year in order to demonstrate compliance.



**Attachment E**  
 Solventless Coatings or Materials Applied

Month / Year	Date	Time	Coating/Material (Name/Type)	Amount Used (units): _____
<b>Total All:</b>				
<b>Total All:</b>				
<b>Total All:</b>				
<b>Total All:</b>				

**Attachment F**  
 Approved Compliance Assurance Monitoring (CAM) Plan  
 (Revised 4/15/16)

**Unenclosed Coaters**

I. Monitoring Approach for Unenclosed Presses. (i.e. not in a permanent total enclosure)

	Indicator #1	Indicator #2	Indicator # 3
I. Indicator	Work Practice	Work Practice	Work Practice
Measurement Approach	Inspect the operational condition of the control device bypass damper and the integrity of the exhaust system from the process to the control device.	Inspect operational condition of all interlocks including: dryer flow and bypass damper position.	Use a smoke stick or equivalent approach to assure the dryer is negative with respect to the surrounding atmosphere.
II. Indicator Range	An excursion is identified as any finding that the integrity of the bypass damper or the exhaust system ductwork has been compromised.	An excursion is identified as any finding that any interlock is inoperative.	General overall flow of smoke should be into the dryer web slot or application capture area.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Any excursion shall require that the process be immediately shut down and remain down until the problem can be corrected. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Process cannot be operated until negative flow into the dryer system or application area is demonstrated. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Properly positioned dampers and leak-free ductwork will assure that all of the normally captured exhaust will reach the control device. Inspections will identify problems.	Properly operating interlocks will assure that the process will be shut down if there is insufficient flow or the bypass damper is open to atmosphere.	Monitoring approach will assure the dryer is set to properly contain supply air and the airflow is into the application capture area.
B. Verification of Operational Status	Inspection records.	Inspection records.	Not applicable.
C. QA/QC Practices and Criteria	Not applicable.	Not applicable.	Not applicable.
D. Monitoring Frequency	Semiannually	Annually	Whenever the location of a between color dryer is disrupted. (This may not be necessary for two piece dryers.)

	Indicator #1	Indicator #2	Indicator # 3
Data Collection Procedure	Record results of inspections and observations.	Record results of inspections and observations.	Not applicable.
Averaging Period	Not applicable.	Not applicable.	Not applicable.
E. Recordkeeping	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Semiannually.	Annually.	Semiannually.

II. Rationale for Selection of Performance Indicators

Unenclosed pressures are designed with a capture system for the application area and dryers which operate under negative pressure. The capture, dryer and exhaust system and the airflow through the system are part of the process designed by the manufacturer. Once installed and tested, it does not change. A properly balanced air system must be maintained in order to meet fire insurance requirements. All exhaust ducts are fitted with flow sensors that will trigger a shutdown of the process if sufficient exhaust flow is not being achieved. Assuring the flow sensor interlocks are properly set and operating will assure the airflow through the system is properly maintained, the process is operating as designed and the design capture efficiency is being achieved.

Monitoring the operation of the bypass damper interlock and integrity of the exhaust system between the process and the control device will assure that the process is exhausting all captured emissions to the control device. Bypass dampers on the system are electronically interlocked to assure the process exhaust stream is directed to the oxidation system during operation.

When necessary after equipment maintenance, or adjustment, a smoke test will verify capture (negative flow from the atmosphere into the exhaust system) at the test location.

III. Rationale for Selection of Indicators Ranges

A performance test is conducted on the dryer and exhaust system when first installed to demonstrate compliance with the capture efficiency required in the air pollution permit or as guaranteed by the manufacturer.

The level at which the low-flow sensor interlock activates is established by the manufacturer at the time of installation. It is set at a level to assure proper operation of the process. Maintaining air flow above this level assures the process is properly operating and provides a reasonable assurance the capture efficiency is being maintained.



**Unenclosed Coaters:**

I. Monitoring Approach for Unenclosed Coaters.

	Indicator #1	Indicator #2	Indicator # 3
I. Indicator	Work Practice	Exhaust flow	Work Practice
Measurement Approach	Inspect the operational condition of the control device bypass damper and the integrity of the exhaust system from the process to the control device.	Continuously monitor an indicator of flow of the process line exhaust system. Monitor either the static pressure, or a direct measure of flow.	Use a smoke stick or equivalent approach to assure the dryer is negative with respect to the surrounding atmosphere.
II. Indicator Range	An excursion is identified as any finding that the integrity of the bypass damper or the exhaust system ductwork has been compromised.	Establish the indicator range at a value greater than 85 percent of the average value measured during the most recent capture efficiency performance test. Establish the indicator range based upon the test data, historical data, and engineering judgment.	General overall flow of smoke should be into the dryer web slot or application capture area.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Process cannot be operated until negative flow into the dryer system or application area is demonstrated. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Properly positioned dampers and leak-free ductwork will assure that all of the normally captured exhaust will reach the control device. Inspections will identify problems.	Continuously monitoring an indicator of flow will assure that adequate flow to achieve the designed capture rate is maintained.	Monitoring approach will assure the dryer is set to properly contain supply air and the airflow is into the application capture area.
B. Verification of Operational Status	Inspection records.	Upon installation, compare to measured flow using a standard flow measurement technique (e.g., EPA Method 2) per manufacturer's instructions.	Not applicable.

	Indicator #1	Indicator #2	Indicator # 3
C. QA/QC Practices and Criteria	Not applicable.	Confirm proper operation and calibration of sensor annually. <ul style="list-style-type: none"> <li>• Static pressure: compare to calibrated meter or manometer, or</li> <li>• Flow sensor: compare to a measured value using a standard method (e.g., EPA Method 2).</li> </ul>	Not applicable.
D. Monitoring Frequency	Semiannually	At least 4 times per hour.	Whenever the location of the application area capture system or dryer exhaust is disrupted. (This may not be necessary for fixed location dryers.)
Data Collection Procedure	Record results of inspections and observations.	Data acquisition system or chart recorder.	Not applicable.
Averaging Period	Not applicable.	One hour	Not applicable.
E. Recordkeeping	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Semiannually.	Semiannually.	Semiannually.

II. Rationale for Selection of Performance Indicators

Unenclosed coaters are designed with a capture system for the application area and dryers which operate under negative pressure. The capture, dryer and exhaust system and the airflow through the system are part of the process designed by the manufacturer. Once installed and tested, it does not change. A properly balanced air system must be maintained in order to meet fire insurance requirements. Continuously monitoring an indicator of flow (e.g., static pressure) and maintaining the flow at the proper level process a reasonable assurance that the capture efficiency is being maintained.

Monitoring the operation of the bypass damper interlock and integrity of the exhaust system between the process and the control device will assure that the process is exhausting all captured emissions to the control device. Bypass dampers on the system are electronically interlocked to assure the process exhaust stream is directed to the oxidation system during operation. Inspections of the ductwork and damper interlocks will ensure their integrity.

When necessary after equipment maintenance, or adjustment, a smoke test will verify capture (negative flow from the atmosphere into the exhaust system) at the test location.

### III. Rationale for Selection of Indicator Ranges

A performance test is conducted on the dryer and exhaust system when first installed to demonstrate compliance with the capture efficiency required in the air pollution permit or as guaranteed by the manufacturer.

The selected indicator range for the indicator of flow is greater than 85 percent of the value measured during the performance test. Maintaining airflow above this level assures the process is properly operating and provides a reasonable assurance the capture efficiency is being maintained.

### **Permanent Total Enclosures (PTE)**

#### I. Monitoring Approach for Permanent Total Enclosures Utilizing Pressure Differential.

	Indicator #1	Indicator #2	Indicator # 3
I. Indicator	Work Practice	Work Practice	Pressure differential
Measurement Approach	Inspect the operational condition of the control device bypass damper, the integrity of the exhaust system from the process to the control device, and the integrity of the enclosure.	Inspect operational condition of bypass damper position interlock.	Monitor pressure differential across the enclosure wall and the surrounding atmosphere.
II. Indicator Range	An excursion is identified as any finding that the integrity of the bypass damper, the exhaust system ductwork, or the enclosure have been compromised.	An excursion is identified as any finding that the bypass interlock is inoperative.	An excursion is defined as a pressure differential of less than (-)0.007" w.c. for 5 consecutive minutes while the process is operating; alternatively, a smaller differential (i.e., less than (-)0.007" w.c. can be used as the indicator if such differential is demonstrated as adequate to qualify the permanent total enclosure with Method 204 criteria.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Any excursion shall require that the process be immediately shut down and remain down until the problem can be corrected. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.

	Indicator #1	Indicator #2	Indicator # 3
III. Performance Criteria			
A. Data Representativeness	Properly positioned dampers, leak-free ductwork and a leak-free enclosure of the process will assure that all of the exhaust will reach the control device. Inspections will identify problems.	Properly operating interlocks will assure that the processes will be shut down if the bypass damper is open to atmosphere.	The monitor measures the pressure differential at the interface between the wall of the enclosure and surrounding atmospheres.
B. Verification of Operational Status	Inspection records.	Inspection records.	Not applicable.
C. QA/QC Practices and Criteria	Not applicable.	Not applicable.	Validation of instrument calibration conducted annually. Compare to calibrated meter, or calibrate using pressure standard, or according to manufacturer's instruction.
D. Monitoring Frequency	Semiannually	Annually	Monitor continuously.
Data Collection Procedure	Record results of inspections and observations.	Record results of inspections and observations.	Record at least once every minute on a chart or electronic media.
Averaging Period	Not applicable.	Not applicable.	Not applicable.
E. Recordkeeping	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of data and of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Semiannually.	Annually.	Semiannually.

II. Rationale for Selection of Performance Indicators

Maintaining the enclosure under sufficient negative pressure at all times assures that the capture efficiency is maintained; therefore, monitoring the differential pressure across the enclosure provides an indicator of performance.

The operation of the bypass damper and integrity of the ductwork between the process and add-on control device are indicative that the process is exhausting all emissions to the control device. Bypass dampers on the system are electrically interlocked to assure the process exhaust stream is directed to the oxidation system during operation.

III. Rationale for Selection of Indicator Ranges

The selected indicator range is a differential pressure of less than -0.007 in. w.c. This indicator range is based upon Method 204 criteria. A differential pressure of -0.007 in. w.c. is considered equivalent to a

face velocity of 200 ft/minute for natural draft openings. Maintaining the enclosure under sufficient negative pressure at all times assures that the capture efficiency is maintained; therefore, monitoring the differential pressure across the enclosure provides an indicator of performance.

The operation of the bypass damper and integrity of the ductwork between the process and add-on control device are indicative that the process is exhausting all emissions to the control device. Bypass dampers on the system are electrically interlocked to assure the process exhaust stream is directed to the oxidation system during operation.

**Catalytic Oxidizers:**

I. Monitoring Approach for Catalytic Oxidizers.

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
I. Indicator	Catalyst bed inlet temperature. <sup>a</sup>	Work practice/ inspection.	Performance test	Catalyst activity analysis.
Measurement Approach	Continuously monitor the operating inlet temperature of the oxidizer catalyst bed.	Inspect internal and external structural integrity of oxidizer to ensure proper operation. <sup>b</sup>	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.	Determine the catalyst activity level by evaluating the conversion efficiency.
II. Indicator Range	Whenever a connected process is in operation an excursion is identified as a catalyst bed inlet temperature measurement of more than 50°F below the setpoint temperature used to demonstrate compliance during the most recent VOC emission test, or as any 3-hour period when the average catalyst bed inlet temperature is less than the setpoint temperature used to demonstrate compliance during the most recent VOC emission test.	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.	The catalyst conversion efficiency is evaluated and compared to typical values for fresh catalyst. An excursion is identified as a finding that the conversion efficiency is beyond the operational range of the catalyst as defined by the manufacturer.

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an inspection, corrective action and a reporting requirement.
<b>III. Performance Criteria</b>				
A. Data Representativeness	Any temperature-monitoring device employed to measure catalyst bed inlet temperature shall be accurate to within 0.5% of temperature measured or $\pm 5^{\circ}\text{F}$ , whichever is greater.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and (if necessary) approved by the regulatory agency prior to conducting the performance test.	Analysis will determine the conversion efficiency of the catalyst.
B. Verification of Operational Status	Temperatures recorded on chart paper or electronic media.	Inspection records.	Not applicable.	Not applicable.
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria $\pm 20^{\circ}\text{F}$ .	Not applicable.	US EPA test methods approved in protocol.	Not applicable.
D. Monitoring Frequency	Measured continuously	External inspection – monthly. Internal Inspection - annually. <sup>c</sup>	Once every five years.	Annually.
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.	Record results of catalyst sample analyses.
Averaging Period	Not applicable if using any measured value as indicator; Three hours if using 3-hour average as indicator.	Not applicable.	Not applicable.	Not applicable.

	Indicator #1	Indicator #2	Indicator #3	Indicator #4
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.	Maintain for a period of 5 years records of catalyst analyses and corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to regulatory agency 30 days prior to test date. Submit test report 60 days after conducting a performance test	Number, duration, cause of any excursion and the corrective action taken.
Frequency	Semiannually.	Semiannually.	For each performance test conducted.	Annually.

<sup>a</sup> Procedure for verifying accuracy maintained on-site.

<sup>b</sup> Internal inspection includes annual assessment of each oxidizer’s heat exchanger for leakage (this assessment may be comprised of an internal inspection, or other method of assessing for leakage).

<sup>c</sup> Evaluation of each catalytic oxidizer’s VOC destruction efficiency using a flame ionization analyzer (FIA) for three 20-minute runs, will serve in lieu of an internal inspection of each oxidizer. This evaluation does not require submittal of a test protocol to the regulatory agency (or approval by the regulatory agency) or submittal of test reports.

## II. Rationale for Selection of Performance Indicators

The oxidizer catalyst bed inlet temperature was selected because it is indicative of this effective operation of catalytic oxidizers. It has been demonstrated that the control efficiency achieved by a catalytic oxidizer is a function of the catalyst temperature and associated catalyst activity. By maintaining the temperature at or above minimum level, a predetermined control efficiency can be expected.

Periodically sampling and testing the catalyst activity will assure that the catalyst will function properly when the minimum bed temperature is maintained. The catalyst conversion efficiency is evaluated and compared to typical values for fresh catalyst.

To further ensure consistent VOC oxidation, the structural integrity of the oxidizer must be checked periodically. This will indicate any problems with oxidizer integrity that could result in decreased oxidizer performance or efficiency.

An emissions performance test on the oxidizer is conducted once every five years to demonstrate compliance with permit conditions (i.e., percent destruction efficiency).

**Regenerative Thermal Oxidizers:**

I. Monitoring Approach for Regenerative Thermal Oxidizers.

	Indicator #1	Indicator #2	Indicator #3
I. Indicator	Oxidizer combustion zone temperature. <sup>a</sup>	Work practice/inspection.	Performance test
Measurement Approach	Continuously monitor the operating temperature of the oxidizer combustion zone.	Inspect internal and external structural integrity of oxidizer to ensure proper operation. <sup>b</sup>	Conduct emissions test to demonstrate compliance with permitted destruction efficiency.
II. Indicator Range	Whenever a connected process is in operation an excursion is identified as a combustion zone temperature measurement of more than 50°F below the setpoint temperature used to demonstrate compliance during the most recent VOC emission test, or as any 3-hour period when the average combustion zone temperature is less than the setpoint temperature used to demonstrate compliance during the most recent VOC emission test.	An excursion is identified as any finding that the structural integrity of the oxidizer has been jeopardized and it no longer operates as designed.	An excursion is identified as any finding that the oxidizer does not meet the permitted destruction efficiency.
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.
III. Performance Criteria			
A. Data Representativeness	Any temperature-monitoring device employed to measure the oxidizer combustion zone temperature shall be accurate to within 0.5% of temperature measured or $\pm 5^{\circ}\text{F}$ , whichever is greater.	Inspections of the oxidizer system will identify problems.	A test protocol shall be prepared and (if necessary) approved by the regulatory agency prior to conducting the performance test.
B. Verification of Operational Status	Temperatures recorded on chart paper or electronic media.	Inspection records.	Not applicable.
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria $\pm 20^{\circ}\text{F}$ .	Not applicable.	EPA test methods approved in protocol.



	Indicator #1	Indicator #2	Indicator #3
D. Monitoring Frequency	Measured continuously	External inspection – monthly. Internal inspection – annually. <sup>c</sup>	Once every five years.
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media.	Record results of inspections and observations.	Per approved test method.
Averaging Period	Not applicable if using any measured value as indicator; Three hours if using 3-hour average as indicator.	Not applicable.	Not applicable.
E. Record Keeping	Maintain for a period of 5 years records of chart recorder paper or electronic media and corrective actions taken in response to excursions.	Maintain for a period of 5 years records of inspections and corrective actions taken in response to excursions.	Maintain a copy of the test report for 5 years or until another test is conducted. Maintain records of corrective actions taken in response to excursions.
F. Reporting	Number, duration, cause of any excursion and the corrective action taken.	Number, duration, cause of any excursion and the corrective action taken.	Submit test protocol and notification of testing to regulatory agency 30 days prior to test date. Submit test report 60 days after conducting a performance test
Frequency	Semiannually.	Semiannually.	For each performance test conducted.

<sup>a</sup> Procedure for verifying accuracy maintained on-site.

<sup>b</sup> Internal inspection includes annual assessment of each oxidizer’s heat exchanger for leakage (this assessment may be comprised of an internal inspection, or other method of assessing for leakage).

<sup>c</sup> Evaluation of each catalytic oxidizer’s VOC destruction efficiency using a flame ionization analyzer (FIA) for three 20-minute runs, will serve in lieu of an internal inspection of each oxidizer. This evaluation does not require submittal of a test protocol to the regulatory agency (or approval by the regulatory agency) or submittal of test reports.

## II. Rationale for Selection of Performance Indicators

The oxidizer combustion zone temperature was selected because it is indicative of a regenerative thermal oxidizer’s operation. By maintaining the temperature at or above a minimum level, a predetermined control efficiency can be expected. If the combustion zone temperature decreases significantly, complete combustion may not occur.

To further ensure consistent VOC oxidation, the structural integrity of the oxidizer must be checked periodically. This will indicate any problems with oxidizer integrity that could result in decreased oxidizer performance or efficiency.

An emissions performance test on the oxidizer is conducted once every five years to demonstrate compliance with permit conditions (i.e., percent destruction efficiency).

## III. Rationale for Selection of Indicator Ranges

The selected indicator range for the oxidizer combustion zone temperature is established based upon demonstrated performance during a performance test.

The minimum required operating temperature of the oxidizer is established at the operating temperature maintained during a performance test. The oxidizer includes a temperature controller that maintains the desired combustion zone temperature by using an auxiliary burner. The temperature controller is set to maintain a temperature at or above the established indicator range.

## STATEMENT OF BASIS

### INSTALLATION DESCRIPTION

Bemis Packaging, Inc. manufactures flexible packaging for food and pharmaceutical operations in Joplin, Missouri. This facility has been previously known as Milprint Packaging, LLC; Pechiney Plastic Packaging, Inc.; and American National Can Company. Process operations for Bemis Packaging, Inc. include flexographic printing, rotogravure printing, adhesive lamination, corona treatment, extrusion lamination, and natural gas-fired drying systems. An Oxidation System is used to control VOC and HAP emissions. The installation is a major source of volatile organic compound (VOC) emissions for the Title V Program and has established area source limits on hazardous air pollutant (HAP) emissions and synthetic minor limits on VOC for the Prevention of Significant Deterioration (PSD) program. This facility is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2.

### Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/yr) <sup>19</sup>
PM <sub>10</sub>	5.37
PM <sub>2.5</sub>	5.37
Sulfur Oxides (SO <sub>x</sub> )	0.25
Nitrogen Oxides (NO <sub>x</sub> )	41.63
Volatile Organic Compounds	< 250
Carbon Monoxide (CO)	34.82
Hazardous Air Pollutants (HAPs)	< 10/25

<sup>19</sup> Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted. HAP and VOC potential emissions are limited by Plantwide Permit Conditions PW001 and PW002. The emergency generators (EP-16 and EP-19) were estimated at 500 hours per year. The PTE calculation excludes fugitive emissions because the facility is not a named source.

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

<b>Pollutants</b>	<b>2016</b>	<b>2015</b>	<b>2014</b>	<b>2013</b>	<b>2012</b>
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	0.54	0.53	0.48	0.46	0.31
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	0.54	0.53	0.48	0.46	0.31
Sulfur Oxides (SO <sub>x</sub> )	0.03	0.03	0.03	0.02	0.02
Nitrogen Oxides (NO <sub>x</sub> )	4.45	4.41	4.18	3.75	2.90
Volatile Organic Compounds (VOCs)	140.70	129.97	117.49	126.22	113.09
Carbon Monoxide (CO)	3.74	3.70	3.51	3.15	2.43
Hazardous Air Pollutants (HAPs)	0.06	0.06	0.06	0.06	0.06
Isomers of Xylene (1330-20-7)	0.01	0.01	0.01	0.01	0.01
Formaldehyde (50-00-0)	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
Toluene (108-88-3)	0.01	0.01	0.01	0.01	0.01
Methyl Alcohol (67-56-1)	0.04	0.04	0.04	0.04	0.04
2,4-Toluene diisocyanate (584-84-9)	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
Methylene(B)4- phenylisocyanate (101-68-8)	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01

**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 May 11, 2015;
- 2) 2016 Emissions Inventory Questionnaire, received April 27, 2017; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) Construction Permit 082012-005A, Issued March 29, 2013;
- 5) Construction Permit 082012-005, Issued August 13, 2012;
- 6) Construction Permit 052012-018, Issued May 30, 2012;
- 7) Construction Permit 082012-005, Issued August 13, 2012;
- 8) Construction Permit 022004-008A, Issued October 3, 2011;
- 9) Construction Permit Exemption Letter dated April 5, 2010;
- 10) Construction Permit Exemption Letter dated April 24, 2007;
- 11) Construction Permit 022004-008, Issued February 17, 2004;

- 12) Construction Permit 032002-020, issued March 27, 2002;
- 13) Construction Permit 12002-001, Issued December 4, 2002;
- 14) Construction Permit 0198-019, Issued January 16, 1998

### **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 10-6.220, *Restriction of Emission of Visible Air Contaminants***

This rule is not applicable because its visible emission sources are exempt for the following reasons: The fugitive emission sources are exempt if subject to 10 CSR 10-6.170. Sources burning only natural gas are exempt. Sources contained within and emit only within a building space are additionally exempt. All sources meet one of these exemptions. Additionally, all sources that emit particulate matter emit under 0.5 lb/hr PM, so visible emissions are generally not expected. As a result, none of the potential visible emission sources are subject to 10 CSR 10-6.220.

### **Construction Permit History**

Construction Permit 0198-019, issued January 16, 1998

A new flexible packaging manufacturing installation comprised of two manufacturing cells.

- Special Condition 1 is superseded by Construction Permit 022004-008A.
- Special Condition 2 is reporting conditions in regards to Special Condition 1. Since Special Condition 1 has been superseded, it can be assumed that this condition is superseded as well.
- Special Condition 3 specified that the VOC capture rate for the total enclosure of the adhesive laminator be verified using "Procedure T - Criteria for and Verification of a Permanent or Temporary Total Enclosure." This refers to 40 CFR 52.741, Appendix B. The requirement was changed to refer to the procedures referenced in US EPA Method 204 in Permit Condition 003.
- Special Condition 4 was superseded by Construction Permit 082012-005.
- Special Condition 5 required an initial verification of a 95% VOC DRE for the catalytic oxidizers. This condition has been satisfied.
- Special Condition 6 is a requirement to submit a Proposed Test Plan for the oxidizers. This condition has been satisfied.
- Special Condition 7 has requirements to construct the oxidizers at a certain height and distance from the property boundaries. This condition has been satisfied.
- Special Condition 8 is in regards to nuisance odors. This condition is redundant as this is

addressed in 10 CSR 10-6.165 which can be found in Section IV of this permit. This condition has not been included.

Construction Permit 032002-020, issued March 27, 2002

Installation of an eight color flexographic printing press with a natural-gas fired dryer and a catalytic oxidizer. The eight color flexographic printing press (EP-09), natural-gas fired dryer, and catalytic oxidizer were never installed.

- Special Condition 1 is superseded by Construction Permit 022004-008A.
- Special Condition 2 requires use of the oxidizer system with EP-09. Since EP-09 was never installed, this special condition has not been added to this permit.
- Special Condition 3 is in regards to keeping inks and solvents in containers. It has been reiterated in other construction permits and thus this condition has not been added in order to streamline this permit.
- Special Condition 4 is in regards to nuisance odors. This condition is redundant as this is addressed in 10 CSR 10-6.165 which can be found in Section IV of this permit. This condition has not been included.

Construction Permit 122002-001, issued December 4, 2002

Use of water-based VOC-containing materials at the third coating deck/dryer on the tandem coextrusion laminator.

- Special Condition 1 was superseded by Construction Permit 022004-008A.
- Special Condition 2 involves keeping inks and solvents in sealed containers. It has been reiterated in other construction permits. As a result, this condition has not been added in order to streamline this permit.
- Special Condition 3 involves compliance with the rescinded 10 CSR 10-3.090 and is thus not included. 10 CSR 10-6.165 is considered 10 CSR 10-3.090's replacement rule.

Construction Permit 022004-008, issued February 17, 2004

Installation of an extrusion coater laminator with a natural gas fired dryer and an oxidizer. It has been superseded by Construction Permit 022004-008A.

Missouri Department of Natural Resources Construction Permit Exemption Letter dated April 24, 2007

This is for the installation of organic liquid storage tanks and ozone treating systems. These units are listed under "Emission Units Without Limitations."

Missouri Department of Natural Resources Construction Permit Exemption Letter dated April 5, 2010

This is for the installation of the laser perforation system. This unit is listed under "Emission Units Without Limitations."

Construction Permit 022004-008A, issued October 3, 2011

Request to remove the existing 40 ton per year VOC limits in Construction Permits 122002-001, 022003-020 and 022004-008 and incorporate into a 250 ton per year installation-wide VOC limit.

- Special Condition 1 supersedes conditions in Construction Permits 0198-019, 122002-001, 022003-020, and 022004-008.
- Special Condition 2 was superseded by Construction Permit 082012-005.
- Special Condition 3 requires use of the oxidizer system with EP-10. It has not been included in

this permit due to being iterated in a later construction permit.

- Special Condition 4, which requires markings on VOC and HAP containers, has been included in this permit.
- Special Condition 5 has general recordkeeping and reporting requirements. It has been added to this permit.

Construction Permit 052012-018, issued May 30, 2012

Modify the existing tandem coextrusion laminator JE-1 third deck by adding solvent capability, increased utilization of rotogravure press JR-2 and corona treaters. All Special Conditions are superseded by Construction Permit 082012-005.

Construction Permit 082012-005, issued August 13, 2012

The second of two phases to install tandem extrusion laminators (JE-3 and JE-4) with dryers, corona treaters, flexographic printing press (JF-2), plastic pellet receiving, regenerative thermal oxidizer and an emergency generator.

- Special Condition 1 supersedes conditions in Construction Permits 022004-008A, 0198-019, and 052012-018.
- Special Conditions 2 and 3 are superseded by Construction Permit 082012-005A.
- Special Condition 4 requires operation of permanent enclosures on certain emission points. It has been added to this permit.
- Special Condition 5 requires use of the oxidization system on certain emission points. It has been added to this permit.
- Special Condition 6, which requires coatings, inks, solvents, and cleaning solutions to be placed in sealed containers, has been added to this permit.
- Special Condition 7 contains general recordkeeping and reporting requirements. It has been added to this permit.
- Special Condition 8 requires initial performance testing to be done on the RTO. This condition has been satisfied. Oxidizer #4 was tested on May 7, 2014. The oxidizer demonstrated 98.7% destruction efficiency under both normal and low VOC loading scenarios. APCP staff approved a waiver request on July 9, 2014 to waive some of the initial performance requirements on the construction permit.
- Special Condition 9 includes requirements if Bemis were to use alternative coatings. It has been added to this permit.

Construction Permit 081012-005A, issued March 29, 2013

Request to add natural gas, direct-fired dryers for printing press JF-2.

- Special Condition 1 supersedes conditions from Construction Permit 082012-005.
- Special Condition 2 contains a 250 ton/yr VOC limitation on equipment of the installation. It has been added in this permit.
- Special Condition 3 contains a 10/25 tons/yr HAP limit on equipment of this installation. It has been added in this permit.
- Special Condition 4 contains general recordkeeping and reporting requirements. It has been added in this permit.

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

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

The storage tanks used at the facility are 8,000 gallons each, and thus do not meet the 75 m<sup>3</sup> capacity requirement for this regulation to apply. The fuel storage tank for the emergency generator is 55 gallons and is also below the 75 m<sup>3</sup> capacity requirement for this subpart to apply.

40 CFR Part 60 Subpart QQ, *Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing*

This subpart applies to all publication rotogravure printing presses. This facility does not operate publication rotogravure printing presses, therefore this subpart does not apply.

40 CFR part 60 Subpart RR, *Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations*

This subpart applies to coating lines used in the manufacture of pressure sensitive tape and label materials. This facility does not have coating lines used in manufacture of pressure sensitive tape and label materials; therefore this subpart does not apply.

40 CFR Part 60 Subpart FFF, *Standards of Performance for Flexible Vinyl and Urethane Coating and Printing*

This subpart applies to rotogravure printing lines which are used to print or coat flexible vinyl or urethane products. This facility does not do this, thus this subpart does not apply.

40 CFR Part 60 Subpart IIII, *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines*

This subpart applies to EP-16 - Emergency Generator and is included in the operating permit under Permit Condition 004.

40 CFR Part 60 Subpart JJJJ, *Standards of Performance for Stationary Spark Ignition Internal Combustion Engines*

This subpart does not apply to EP-16 – Emergency Generator because it is not a spark ignition internal combustion engine. This subpart does apply to EP-19 and has been incorporated into the permit.

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

40 CFR Part 63 Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*

This process does not use halogenated solvents for its cleaning process and thus this regulation does not apply.

40 CFR Part 63 Subpart KK, *National Emission Standards for the Printing and Publishing Industry*

This rule is applicable to sources at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated who are a major source of hazardous air pollutants (HAP) or who meet the criteria for establishing the facility to be an area source of HAP with respect to the rule.



The installation began operation in 1998. Although the installation did not declare area source status before the initial compliance date for Subpart KK of May 30, 1999, HAP emissions never exceeded the major source threshold. As a part of their initial operating permit OP2000-137, issued December 12, 2000, the installation accepted federally enforceable permit limits to restrict HAP emissions from the entire facility to less than 10 tons of any individual HAP and less than 25 tons total HAP in any consecutive 12-month period. Because of these voluntary limits, the facility was considered to be an area source and therefore subject only to the record keeping provisions of §63.829(d) and the initial notification provisions of §63.830(b)(1) of the rule.

During the EPA review process of issuing the renewal of OP2000-137, it was determined that the facility did not request the 10/25 HAP limits before the initial compliance date of Subpart and therefore should not have been granted area source status. Although actual emissions of HAPs never exceeded the major source threshold, it is potential emissions, not actual emissions that are considered when determining MACT applicability. Because of these reasons, Subpart KK has been applied to the facility in this renewal permit and will apply in all future permits under the “Once-In-Always-In” policy.

40 CFR Part 63 Subpart JJJJ, *National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating*

Pursuant to the provisions of 40 CFR §63.821(a)(3), Bemis has opted to include EP-08 Tandem Extrusion Laminator JE-1 (decks 1 and 2); EP-10 Extrusion Coater Laminator JE-2; and EP-08B JE-1 (deck 3) in the applicability of Subpart KK. This renders the provisions of 40 CFR 63, Subpart JJJJ (Paper and Other Web Coating) not applicable for those units by §63.3300(a).

40 CFR Part 63 Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

This subpart applies to EP-16 – Emergency Generator, however according §63.6590(c), the unit meets the requirements of MACT ZZZZ by complying with NSPS IIII; therefore it was not included in the operating permit.

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

In the permit application and according to APCP records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

**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 was determined to be applicable to the flexographic printers, rotogravure printers, extrusion laminators and adhesive laminator because these units use control devices to maintain VOC emissions below the PSD major source threshold of 250 tons per year. Emissions from these units are controlled by a combined Oxidation System consisting of three catalytic oxidizers (EP-11A, EP-11B, and EP-11C) and Regenerative Thermal Oxidizer (EP-11D). The combined system is identified as EP-11.

EP-01, EP-02, EP-06, EP-08, EP-10, EP-11, EP-14, and EP-15 are required to be vented to the Oxidation System and the Oxidation System is required to be operational whenever these units are in use. Permit Condition 003 contains all of the maintenance and monitoring requirements for the oxidizers and references Attachment F which contains the complete Compliance Assurance Monitoring Plan for the Oxidation System.

Each CAM plan contains three indicators which are used as different methods to ensure proper operation of the equipment.

### **Greenhouse Gas Emissions**

Note that this source *may* be subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO<sub>2</sub> emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO<sub>2</sub> 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 CO<sub>2</sub> emissions data by visiting <http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html>.

### **Other Regulatory Determinations**

10 CSR 10-6.170, *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*  
All of the facilities emission sources emit within a building. As a result, emissions beyond the property line are not expected. Monitoring, recordkeeping, and reporting have thus been removed from the Core Permit Requirements.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*  
This rule restricts the emission of particulate matter from an industrial process based on the maximum design capacity of that process. The rule was determined not to be applicable to the installation because 10 CSR 10-6.400 exempts emission units that at maximum design capacity have a potential to emit less than one-half (0.5) pounds per hour of particulate matter.

The tandem co-extrusion laminators (EP-14 and EP-15) at the installation were determined to be exempt. The maximum hourly process rate was listed as 1,500 pounds per hour (0.75 tons per hour) in the application for Construction Permit #0198-109. Using an emission factor of 0.005 pounds PM / ton processed for EP-14 and 0.0048 pounds PM / ton processed for EP-15 from MoEIS, the maximum potential emissions rate was calculated to be 0.004 pounds / hour for both.

The pellet silos (EP-18) is also exempt as its potential to emit is less than 0.5 pounds per hour. The maximum hourly process rate was listed as 8 tons per hour. Using an emission factor of 0.032 pounds PM / ton processed from MoEIS the maximum potential emission rate was calculated to be  $(8) \times (0.032) = 0.26$  pounds per hour.

EP-11 is also exempt via 6.400(1)(B)(12) for emitting less than 0.5 pounds per hour of particulate matter. EP-12 is exempt by 6.400(B)(6) for burning fuel for indirect heating and EP-17 by 6.400(B)(7) for being fugitive emissions.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

EP-19 is exempt from these rules due to using exclusively natural gas or optionally during emergencies, propane. EP-19 is exempt via 6.260(1)(A)(2) and 6.261(1)(A).

EP-16 - Emergency Generator is subject to these rules. The following calculations demonstrate compliance with 10 CSR 10-6.260 and 10 CSR 10-6.261 for the emergency generator (EP-16) when burning fuel oil with a sulfur content less than 0.1%:

$$\text{Distillate Oil } SO_2 \text{ emission factor (lbs/MMBtu)} = \frac{138(0.1) \text{ lbs}/10^3 \text{ gal}}{140 \text{ MMBtu}/10^3 \text{ gal}} = 0.0986 \text{ lb/MMBtu}$$
$$\text{ppm}_v \text{ } SO_2 = \left( \frac{0.0986 \text{ lb}}{\text{MMBtu}} \right) \times \left( \frac{\text{MMBtu}}{10,320 \text{ wscf}} \right) \times \left( \frac{\text{ppmw}}{1.660E^{-7} \text{ lb/scf}} \right) \times \left( \frac{0.45 \text{ ppmv}}{\text{ppmw}} \right) = 25.89 \text{ ppm}_v$$

Emission factor was obtained from webFIRE using an SCC code of 20200401.

**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

The draft Part 70 operating permit renewal for Bemis Packaging, Inc. was placed on public notice March 3, 2017 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <http://dnr.mo.gov/env/apcp/permit-public-notices.htm>. Comments were received from the EPA on March 26, 2017. The comments will be addressed within this Response to Public Comments document.

### Public Comment #1

Based on EPA's response in the order granting in part a petition for objection to the operating permit for Yuhuang Chemical, Inc.-Methanol Plant in St. James Parish, Louisiana (August 31, 2016), Permit Condition PW001 and Permit Condition PW002 may not be enforceable. In this petition response, EPA says that if a permit applicant agrees to restrict a facility's potential-to-emit (PTE), only limits that meet certain enforceability criteria may be used to restrict the PTE and the permit must include terms and conditions such that the source cannot legally exceed the limits. One of the key concepts in evaluating the enforceability of PTE limits is whether the limits are enforceable as a practical matter. Moreover, the concept of federal enforceability has also been interpreted to encompass a requirement for practical enforceability. In order for emission limits to be enforceable as a practical matter, the permit must clearly specify **how** (emphasis added) emissions will be measured or determined for purposes of demonstrating compliance with the limits. Thus, limitations must be supported by monitoring, record keeping and reporting requirements sufficient to enable regulators and citizens to determine whether the limits have been exceeded, and if so, to take appropriate action.

This draft Part 70 operating permit for Bemis Packaging, Inc., in Joplin, does not adequately justify **how** (emphasis added) the ten (10) monitoring conditions in Permit Condition PW001 and the eight (8) monitoring conditions in Permit Condition PW002 are sufficient to ensure that the 250.0 tons of VOC emission limit and the 10.0/25.0 tons of HAPs emission limit, intended to restrict Bemis-Joplin PTE, is enforceable as a practical matter. MDNR does not explain and the permit does not specify how the recorded information is used to demonstrate compliance with the VOC and HAP limits.

Therefore, in order to ensure that the unit specific emission limits intended to restrict PTE are enforceable as a practical matter, MDNR is encouraged to ensure the final permit clearly states or demonstrates **how** (emphasis added) Bemis-Joplin will calculate actual emissions to demonstrate compliance with the emission limits from each of the emission units. To the extent that the final permit depends on emission factors for calculating emissions to demonstrate compliance, the permit should specify the source of the emission factor(s).

### MoDNR's Response to Comment #1:

Attachments B, C1, and C2 have been added to the permit draft in order to specify how emissions shall be determined to improve enforceability.

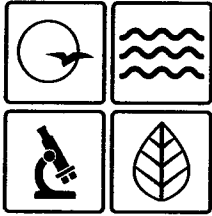
### Public Comment #2:

Although it is generally preferred that PTE limitation be as short-term as possible (e.g. not to exceed one month), EPA guidance allows permits to be written with longer term limits, if they are rolled (i.e. recalculated periodically with updated data) on a frequent basis (e.g. daily or monthly). The VOC and HAP limits in the Bemis-Joplin draft Part 70 operating permit are stated in terms of "tons in any 12-

month consecutive period." The implication is that the data is too be rolled monthly; however, EPA suggests MDNR specify clearly that Bemis-Joplin calculate their emissions with a monthly roll.

**MoDNR's Response to Comment #2:**

Permit Condition 001 and 002, as well as Attachments B, C1, and C2, have been updated to clarify that the data should be rolled monthly.



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

JUL 24 2017

Mr. Daniel Gau  
Bemis Packaging, Inc.  
3210 North Progress Avenue  
Joplin, MO 64801

Re: Bemis Packaging, Inc., 097-0132  
Permit Number: OP2017-058

Dear Mr. Gau:

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.

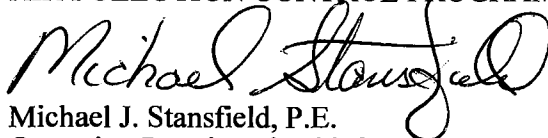
This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request 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:kwj

Enclosures

c: PAMS File: 2016-05-030

