



## 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:** OP2016-016  
**Expiration Date:** OCT 25 2021  
**Installation ID:** 021-0095  
**Project Number:** 2014-12-043

**Installation Name and Address**

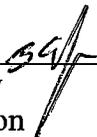
BlueScope Buildings North America Inc  
2250 SW Lower Lake Road  
St. Joseph, MO 64504  
Buchanon County

**Parent Company's Name and Address**

Bluescope Buildings North America Inc  
1540 Genessee St.  
Kansas City MO, 64102

**Installation Description:**

BlueScope Buildings North America, Inc. participates in manufacturing processes such as cutting, welding, forming, and painting to produce pre-engineered metal building systems. The facility is a major source of Volatile Organic Compounds (VOCs) and is subject to MACT MMMM for Surface Coating of Miscellaneous Metal Parts and Products.

Prepared by   
Bern Johnson  
Operating Permit Unit

  
Director of Designee  
Department of Natural Resources

OCT 25 2016

Effective Date

## Table of Contents

<b>I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING .....</b>	<b>3</b>
INSTALLATION DESCRIPTION .....	3
EMISSION UNITS WITH LIMITATIONS .....	3
EMISSION UNITS WITHOUT LIMITATIONS .....	4
<b>II. PLANT WIDE EMISSION LIMITATIONS.....</b>	<b>5</b>
PERMIT CONDITION PW001 .....	5
10 CSR 10-6.060 Construction Permits Required .....	5
Construction Permit No. 0294-006A, Issued March 25, 1997 .....	5
<b>III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS .....</b>	<b>6</b>
PERMIT CONDITION 1 .....	6
10 CSR 10-6.060 Construction Permits Required .....	6
Construction Permit No. 0294-006A, Issued March 25, 1997 .....	6
PERMIT CONDITION 2 .....	7
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations .....	7
40 CFR Part 63 Subpart M, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products .....	7
PERMIT CONDITION 3 .....	10
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants .....	10
<b>IV. CORE PERMIT REQUIREMENTS .....</b>	<b>11</b>
<b>V. GENERAL PERMIT REQUIREMENTS.....</b>	<b>17</b>
<b>VI. ATTACHMENTS .....</b>	<b>23</b>
ATTACHMENT A.....	24
Opacity Emission Observations.....	24
ATTACHMENT B.....	25
Fugitive Emission Observations .....	25
ATTACHMENT C.....	26
Method 9 Opacity Emissions Observations.....	26
ATTACHMENT D.....	27
Inspection/Maintenance/Repair/Malfunction Log .....	27
ATTACHMENT E.....	28
Volatile Organic Compound Tracking Sheet.....	28

## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

BlueScope Buildings North America, Inc. participates in manufacturing processes such as cutting, welding, forming, and painting to produce pre-engineered metal building systems. The facility is a major source of Volatile Organic Compounds. It is not a named source and fugitive emissions are not counted towards potential-to-emit.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2014	2013	2012	2011	2010
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	0.00	0.00	0.00	0.00	0.00
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	0.00	0.00	0.00	0.00	0.00
Sulfur Oxides (SO <sub>x</sub> )	0.00	0.00	0.00	0.00	0.00
Nitrogen Oxides (NO <sub>x</sub> )	0.00	0.00	0.00	0.00	0.00
Volatile Organic Compounds(VOC)	133.51	124.27	119.26	92.15	107.15
Carbon Monoxide (CO)	0.00	0.00	0.00	0.00	0.00
Hazardous Air Pollutants (HAPs)	0.22	0.21	0.20	0.16	0.20

### 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.

2014 EIQ Emission Point #	Description
EP-2	Frames dip tank
EP-6	Panel line
EP-7	Gage Bay spray paint
	MIG Welders

**EMISSION UNITS WITHOUT LIMITATIONS**

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

2014 EIQ Emission Point #	Description
EP-5	plantwide space heaters
	3 – Air Cutting Plasma Units
	7 – Submerged Arc Welders

## 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 or Emission Units without Limitations.

### **PERMIT CONDITION PW001**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit No. 0294-006A, Issued March 25, 1997

#### **Emission Limitation:**

- 1) The permittee shall not emit more than 249 tons of volatile organic compounds (VOCs) per rolling 12-month period [Special Condition 1].

#### **Operational Limitations:**

- 1) The permittee shall keep all containers with VOCs tightly closed at all times, except when production, sampling, maintenance, or inspection procedures require operator access [Special Condition No. 2: ].

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

- 1) The permittee shall calculate and record monthly and 12-month total rolling emissions of VOCs. A custom tracking sheet developed by Bluescope, VOC HAP [2015] WITH PPG.xls, has been reviewed by Air Pollution Control Program staff and may be used. An example of this worksheet is in Attachment E.
- 2) All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

#### **Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program Compliance/Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the permittee determines that the emission unit limit above has been exceeded.
- 2) Reports of any deviations from monitoring, record keeping, and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as 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 1</b>		
10 CSR 10-6.060 Construction Permits Required Construction Permit No. 0294-006A, Issued March 25, 1997		
2014 EIQ Emission Point #	Description	Manufacturer – Date
	MIG Welders	various

**Operational Limitations:**

- 1) The permittee shall use a dust collector to control the particulate emissions emanating from the MIG welding operation. This dust collector shall be in use at all times and maintained in accordance with the manufacturer’s specifications. Replacement dust collector cartridges shall be kept on hand at all times [Special Condition No. 3: ].

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain an operating and maintenance log for the dust collector, using Attachment D or an equivalent.
- 2) All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources’ personnel upon request.

**Reporting:**

- 1) Reports of any deviations from monitoring, record keeping, and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

<b>PERMIT CONDITION 2</b>		
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63 Subpart M, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products		
2014 EIQ Emission Point #	Description	Manufacturer – Date
EP-2	Frames dip tank	custom - 1993
EP-6	Panel line	Bradbury – 1985
EP-7	Gage Bay spray paint	custom - 1993

**Emission Limitations:**

- 1) The permittee shall limit organic HAP emissions to no more than 0.31 kg organic HAP per liter (2.6 lb/gal) coating solids used during each rolling 12-month compliance period. [§63.3890(b)(1)]

**Compliance Methods:**

- 1) The permittee must include all coatings (as defined in §63.3981), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than 0.31 kg organic HAP per liter (2.6 lb/gal) coating solids used during each 12-month compliance period. The permittee must use at least one of the three compliance options listed in paragraphs (a) through (c) of §63.3981. The permittee has chosen to use option a) Compliant Material Option (described below). If the permittee switches between compliance options for any coating operation or group of coating operations, it must document this switch as required by §63.3930(c), and must report it in the next semiannual compliance report required in §63.3920. [§63.3891]
  - a) *Compliant material option.* Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to 0.31 kg organic HAP per liter (2.6 lb/gal) coating solids used during each 12-month compliance period, and that each thinner and/or other additive, and cleaning material used contains no organic HAP.
- 2) For each compliance period to demonstrate continuous compliance, the permittee must use no coating for which the organic HAP content (determined using Equation 2 of §63.3941) exceeds 0.31 kg organic HAP per liter (2.6 lb/gal) coating solids used during each 12-month compliance period, and use no thinner and/or other additive, or cleaning material that contains organic HAP, determined according to §63.3941(a). A compliance period consists of 12 months. Each month is the end of a compliance period consisting of that month and the preceding 11 months. [§63.3942(a)]
- 3) As part of each semiannual compliance report, the permittee must identify the coating operation(s) for which it used the compliant material option. If there were no deviations from 0.31 kg organic HAP per liter (2.6 lb/gal) coating solids used during each 12-month compliance period, the permittee shall submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because no coatings were used for which the organic HAP content exceeded 0.31 kg organic HAP per liter (2.6 lb/gal) coating solids used during each 12-month compliance period, and no thinner and/or other additive, or cleaning material that contained organic HAP, was used. [§63.3942(c)]

**Recordkeeping:**

- 1) The permittee must collect and keep records of the data and information specified in this section. Failure to collect and keep these records is a deviation from the applicable standard. [§63.3930]
  - a) A copy of each notification and report submitted to comply with Subpart MMMM, and the documentation supporting each notification and report. [§63.3930(a)]
  - b) A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If testing was conducted to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee must keep a copy of the complete test report. If the information used is provided by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provided by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [§63.3930(b)]
  - c) For each compliance period:
    - i) A record of the coating operations used for each compliance option and the time periods (beginning and ending dates and times) used. [§63.3930(c)(1)]
    - ii) For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of §63.3941. [§63.3930(c)(2)]
  - d) A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. The permittee may maintain purchase records for each material used rather than a record of the volume used. [§63.3930(d)]
  - e) A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight. [§63.3930(e)]
  - f) A record of the volume fraction of coating solids for each coating used during each compliance period. [§63.3930(f)]
  - g) If the permittee uses an allowance in Equation 1 of §63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to §63.3951(e)(4), it must keep records of the following information: [§63.3930(h)]
    - i) The name and address of each TSDF to which the permittee sent waste materials for which it uses an allowance in Equation 1 of §63.3951; a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment. [§63.3930(h)(1)]
    - ii) Identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials in Equation 1 of §63.3951. [§63.3930(h)(2)]
    - iii) The methodology used in accordance with §63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment. [§63.3930(h)(3)]
  - h) The permittee must keep records of the date, time, and duration of each deviation. [§63.3930(j)]

- i) The permittee's records must be in a form suitable and readily available for expeditious review, according to §63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [§63.3931(a)]
- j) As specified in §63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.3931(b)]
- k) The permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to §63.10(b)(1). It may keep the records off-site for the remaining 3 years. [§63.3931(c)]

**Reporting:**

- 1) *Semiannual compliance reports.* The permittee must submit semiannual compliance reports for each affected source according to the following requirements. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act. [§63.3920(a)]
  - a) *Dates.* Unless the Director has approved or agreed to a different schedule for submission of reports under §63.10(a), the permittee must prepare and submit each semiannual compliance report according to the following dates. Note that the information reported for each of the months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [§63.3920(a)(1)]
    - i) Each semiannual compliance report must cover the semiannual reporting period from January 1 through June 30 or the semiannual reporting period from July 1 through December 31. [§63.3920(a)(1)(ii)]
    - ii) Each semiannual compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semiannual reporting period. [§63.3920(a)(1)(iii)]
    - iii) For each affected source that is subject to permitting regulations pursuant to 40 CFR Part 70 or 40 CFR Part 71, and if the permitting authority has established dates for submitting semiannual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), the permittee may submit the first and subsequent compliance reports according to the dates the permitting authority has established instead of according to the date specified in paragraph (a)(1)(iii) of this section. [§63.3920(a)(1)(iv)]
  - b) *Inclusion with title V report.* Each affected source that has obtained a title V operating permit pursuant to 40 CFR Part 70 or 40 CFR Part 71 must report all deviations as defined in subpart MMMM in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report pursuant to this section along with, or as part of, the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in subpart MMMM, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority. [§63.3920(a)(2)]
  - c) *General requirements.* The semiannual compliance report must contain the following information. [§63.3920(a)(3)]
    - i) Company name and address. [§63.3920(a)(3)(i)]

- ii) Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [§63.3920(a)(3)(ii)]
- iii) Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30 or December 31. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [§63.3920(a)(3)(iii)]
- iv) Identification of the compliance option or options specified in §63.3891 that was used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, it must report the beginning and ending dates for each option used. [§63.3920(a)(3)(iv)]
- d) *No deviations.* If there were no deviations from the emission limitations in §§63.3890, 63.3892, and 63.3893 that apply to the permittee, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. [§63.3920(a)(4)]
- e) *Deviations: Compliant material option.* If the permittee used the compliant material option and there was a deviation from the applicable organic HAP content requirements in §63.3890, the semiannual compliance report must contain the following information. [§63.3920(a)(5)]
  - i) Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used. [§63.3920(a)(5)(i)]
  - ii) The calculation of the organic HAP content (using Equation 2 of §63.3941) for each coating identified in paragraph (a)(5)(i) of this section. The permittee does not need to submit background data supporting this calculation ( *e.g.*, information provided by coating suppliers or manufacturers, or test reports). [§63.3920(a)(5)(ii)]
  - iii) The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material. The permittee does not need to submit background data supporting this calculation ( *e.g.*, information provided by material suppliers or manufacturers, or test reports). [§63.3920(a)(5)(iii)]
  - iv) A statement of the cause of each deviation. [§63.3920(a)(5)(iv)]

<b>PERMIT CONDITION 3</b>		
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants		
2014 EIQ Emission Point #	Description	Manufacturer – Date
none	MIG Welders	various

**Emission Limitation:**

- 1) The permittee shall not cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of 20 percent for these emission units.

**Monitoring/Recordkeeping/Reporting:**

- 1) None (see Statement of Basis)

## IV. Core Permit Requirements

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

### **10 CSR 10-6.045 Open Burning Requirements**

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
  - i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of

the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.

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

#### **10 CSR 10-6.060 Construction Permits Required**

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

#### **10 CSR 10-6.065 Operating Permits**

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

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

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

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

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) The permittee may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.

- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 6) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

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

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

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

##### **This requirement is not federally enforceable.**

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

#### **10 CSR 10-6.170**

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

##### **Emission Limitation:**

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

- a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
- b) Paving or frequent cleaning of roads, driveways and parking lots;
- c) Application of dust-free surfaces;
- d) Application of water; and
- e) Planting and maintenance of vegetative ground cover.

**Monitoring:**

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

The permittee shall maintain the following monitoring schedule:

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

**Recordkeeping:**

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

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

<b>10 CSR 10-6.180 Measurement of Emissions of Air Contaminants</b>
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- 1) The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

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

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

**10 CSR 10-6.280 Compliance Monitoring Usage**

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

**Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone**

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance

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

## V. General Permit Requirements

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

### **10 CSR 10-6.065(6)(C)1.B Permit Duration**

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

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

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

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

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

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

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

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

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

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

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

permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

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

None.

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

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

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

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

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

Readings ranged from \_\_\_\_\_ to \_\_\_\_\_ % opacity.

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



**ATTACHMENT E**

Volatile Organic Compound Tracking Sheet

(example of installation worksheet)

Product	#VOC	HAPs		2015 VOC by month					By month received					Totals	lbs. VOC	tons VOC	dip	booth	gage sp	panel				
		sol gal	% solids	Jan	Feb	Mar	Apr	May	June	July	Aug	Sep	Oct								Nov	Dec		
SAL77039 PPG WHITE	3.74	0.04	46.02			1,540.00									1,540.00	gallons	5,759.60	2.88	D	2.88	-	-	-	
SAL77040 PPG RED	4.26	0.05	39.15												-	gallons	-	-	D	-	-	-	-	
SAL77041 PPG BRONZE	4.15	0.05	40.57			1,000.00									1,000.00	gallons	4,150.00	2.08	D	2.08	-	-	-	
SAL76855 GRAY	4.42	0.05	36.79		12,471.00										12,471.00	gallons	55,121.82	27.56	D	27.56	-	-	-	
AXA0796 NEW GRAY	4.69	0.79	28.06		(10,300.00)	1,000.00	1,500.00	2,400.00	2,310.00						(3,090.00)	gallons	(14,492.10)	(7.25)	D	(7.25)	-	-	-	
D100 SOLVENT	7.30	0.24	-	600.00											600.00	gallons	4,380.00	2.19	D	2.19	-	-	-	
ISOPAR L	6.40	-	-												-	gallons	-	-	P	-	-	-	-	
SIKA 511 MASTIC	0.81	-	-												-	gallons	-	-	P	-	-	-	-	
Dowanol PM	7.54	-	-												-	gallons	-	-	D	-	-	-	-	
N BUTYL ACETATE	7.34	-	-	2,970.00	2,421.00	2,492.00	1,487.00								9,370.00	gallons	68,813.28	34.41	G	-	-	34.41	-	
MEK	6.71	-	-												-	gallons	-	-	G	-	-	-	-	
71-X111A additive	6.75	-	-												-	gallons	-	-	D	-	-	-	-	
275.12 Devan sealant*	1.42	-	-			588.00	199.00	192.00							979.00	gallons	1,386.26	0.69	P	-	-	-	0.69	
Barsol A-3732								291.00																
POUNDS OF VOC				4,380.00	28,626.50	33,212.03	25,336.25	22,458.31	11,105.77	-	-	-	-	-	125,118.86	lbs. VOC	125,118.86							
TONS OF VOC				2.19	14.31	16.61	12.67	11.23	5.55	-	-	-	-	-	62.56	tons VOC	62.56				27.46	-	34.41	0.69
Rolling 12 mo. Total				135.10	137.51	141.29	141.12	140.47	136.48	122.09	106.42	93.30	82.22	74.20	62.56					gallons=	12,521.00	#REF!	#REF!	#REF!
HAPs lbs. for month				144.54	(2,053.84)	270.31	332.51	532.02	512.07	-	-	-	-	-	-									
Solid gal for month				-	1,697.90	1,395.01	420.90	673.44	648.19	-	-	-	-	-	-									
HAP lbs/sol gal month				#DIV/0!	(1.21)	0.19	0.79	0.79	0.79	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!	#DIV/0!									
12 mo total HAPs				10,485.23	7,754.45	7,232.39	6,491.25	6,068.69	5,828.57	4,667.52	3,322.28	2,256.15	1,396.18	775.55	(262.40)									
12 mo total sol gal				9,092.80	10,207.34	10,747.12	10,179.46	10,095.28	10,154.21	9,228.23	7,889.49	6,963.51	6,386.31	5,965.41	4,835.43									
12 month HAP avg,				1.15	0.76	0.67	0.64	0.60	0.57	0.51	0.42	0.32	0.22	0.13	(0.05)									
HAP lbs.	#####			41,640.00	41,671.00	41,699.00	41,730.00	41,760.00	41,791.00	#####	41,852.00	41,883.00	41,913.00	41,944.00	41,974.00									
Solid gal.	#####			68.24	676.95	792.37	1,073.65	954.57	752.19	1,161.05	1,345.24	1,066.13	859.97	620.63	1,037.94									
Tons VOC	#####			0.78	11.90	12.83	12.84	11.88	9.54	14.38	15.68	13.11	11.08	8.02	11.64									

\*Devan sealant weighs 11.3 pounds per gallon

## STATEMENT OF BASIS

### Permit Reference Documents

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

Since the issuance of the previous operating permit, one of the two emission units with limitations, EP-4 Paint Drying Oven, has been discontinued and dismantled.

- 1) Part 70 Operating Permit Application, received December 19, 2014;
- 2) Operating Permit OP2010-087, issued August 3, 2010;
- 3) 2014 Emissions Inventory Questionnaire, received April 3, 2015;
- 4) Construction Permit 0294-006, issued January 19, 1994;
- 5) Construction Permit amendment 0294-006A, issued April 14, 1997;
- 6) WebFIRE; and
- 7) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

### 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 10-2.040, *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating* was included in the previous operating permit, but has since been rescinded.

10 CSR 10-6.100, *Alternate Emission Limits*

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

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds* and 10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions* – all combustion equipment at the installation uses pipeline grade natural gas. Combustion equipment that uses exclusively pipeline grade natural gas as defined in 40 CFR 72.2 or liquefied petroleum gas as defined by American Society for Testing and Materials (ASTM), or any combination of these fuels are exempt from the requirements of these rules [(1)(A)(2) and (1)(A)].

10 CSR 10-6.405, *Restriction of Emission of Particulate Matter From From Fuel Burning Equipment Used for Indirect Heating* is not applicable because the only source of particulate matter is from natural-gas usage.

**Construction Permit History**

Construction Permit 0294-006, issued January 19, 1994, and amendment 0294-006A, issued April 14, 1997; – this permit was issued to comply with 10 CSR 10-6.060 for an existing facility. It included a 250 tpy VOC limit and a requirement to capture particulate emissions from welding in a hood. The amendment removed a requirement to measure pressure drop across the hood. Particulate matter emissions were considered so small that PTE was not calculated.

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

None.

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

40 CFR Part 63 Subpart M, *National Emission Standard for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products* is applicable and has been included in this operating permit. Initial Notification was received by the Air Pollution Control Program on December 30, 2004. The facility currently chooses to comply with the compliant materials option. The facility is currently an area source for HAPs due to a recent decrease of HAP content in their coatings. Despite becoming a minor source for HAPs the facility must still comply with this subpart, because of the “once in, always in” principle.

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

None.

**Compliance Assurance Monitoring (CAM) Applicability**

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

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

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

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units uses a control device to achieve compliance with a relevant standard.

**Updated Potential to Emit for the Installation**

Pollutant	Potential to Emit (tons/yr) <sup>1</sup>
CO	0.67
HAP	9.17
NO <sub>x</sub>	3.37
PM <sub>10</sub>	1.37
PM <sub>2.5</sub>	0.29
SO <sub>x</sub>	0.02
VOC	5,291.63

HAP	Potential to Emit (tons/yr) <sup>1</sup>
xylene	1.13
cobalt	4.27
manganese	3.76

<sup>1</sup>Each emission unit was evaluated at 8,760 hours of annual operation unless otherwise noted. PTE calculations do not include emissions from welding or metal cutting, which are minimal.

### **Other Regulatory Determinations**

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* Particulate emissions from welding are required to be routed to a dust collector in Permit Condition 1, which makes visible emissions negligible. Therefore, the monitoring requirements of 6.220 are not necessary. The other emission points have only VOC or gas combustion emissions, which are also negligible.

10 CSR 10-6.400 *Restriction of Emission of Particulate Matter From Industrial Processes* is exempt under (1)(B)12 for emission from the spray booth. The only other source of particulates is from the burning of natural gas. Particulate emissions from welding are minimal and captured by a hood (see Permit Condition 1).

### **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

A draft of the Part 70 Operating Permit for BlueScope Buildings North America Inc. was placed on public notice on April 8, 2016, by the Missouri Department of Natural Resources (MDNR). Comments were received from Mr. Mark Smith of Region VII of the Environmental Protection Agency. The three comments are addressed in the order in which they appear within the letter..

### Comment #: 1

Permit Condition 2 incorporates the applicable requirements from 40 CFR Part 63, Subpart MMMM: “*National Emission Standards for Hazardous Air Pollutants for the Surface Coating of miscellaneous metal Parts and Products*” (MACT MMMM). It appears that MDNR is attempting to streamline Permit Condition 2 by “incorporating by reference” (IBR) many of the applicable requirements from 40 CFR part 63, Subpart MMMM.

EPA strongly supports and encourages the permit authority use of IBR and has issued guidance that describes EPA’s recommended approach. This guidance says that IBR in operating permits may be appropriate and useful under several circumstances including referencing of test method procedures; inspection and maintenance plans; and compliance determination calculation methodology. EPA’s guidance also recommends that all emission limits, operation requirements, compliance determinations, and monitoring, recordkeeping, and reporting, applicable to the specific emission unit(s), must be clearly incorporated into the permit. There is value to be gained by the permittee and the permitting authority through review of specific requirements and extraction of those that are applicable and translating them in a logical fashion as operating permit conditions.

Therefore, EPA strongly encourages MDNR to include the applicable 40 CFR part 63, Subpart MMMM specific operation, continuous compliance, monitoring, record keeping and reporting tasks as requirements in Permit Condition 2 and recommends the following revisions:

- Emission limitation of “0.31 kg organic HAP per liter (2.6 lb/gal) coating solids used during each 12-month compliance period” in place of “the applicable emission limit in §63.3890” in Compliance Method 1); in Compliance Method 1)a); Compliance Method 2); Compliance Method 4); and Reporting Requirement 1)d);
- The detailed requirements of §§ 63.3940, 63.3941; and 63.3942, should be spelled out in Compliance Method 1)a);
- Specify the initial compliance period in Compliance Method 2);
- Compliance Method 1) says the the permittee has chosen to use option a); *Compliant Material Option*, for compliance verification and yet Compliance Method 3) begins with “If the permittee chooses to comply with the emission limitations by using the compliant material option;”
- Compliance Method 3); General Compliance Requirement 1); Record Keeping requirement 1) and 1)g); and Reporting requirement 1); 1)a); 1)a)iii); 1)b); 1)c); and 1)e); all refer to paragraphs specified throughout “this section” (emphasis added) and operating permits do not have sections.

Finally, 40 CFR 63 Subpart M had a compliance date of January 2, 2007 and therefore it would appear that the General Notification requirements have already been completed and the Notifications requirement, on page 8 of the draft permit, may no longer be applicable and should be removed from the operating permit.

**Response to Comment:**

The suggested revisions to Permit Condition 2 were made to further streamline the requirements. References to sections of the Subpart were removed or replaced by text of the actual requirement. The initial compliance period has long passed, so references to it were removed. In some cases, the phrase “If the permittee chooses to comply...by using the compliant materials option” were retained if it seemed to clarify the permittee’s responsibilities.

**Comment #: 2**

This draft operating permit includes an Attachment B (Fugitive Emission Observations) and an Attachment C (Method 9 Opacity Emission Observations). However, neither Attachment B nor Attachment C is referenced for use in any of the permit conditions or requirements. EPA suggests that if these attachments are not being used, they be removed from the operating permit.

**Response to Comment:**

Attachments B and C are referenced in the General Requirements section under 10 CSR 10-6.170 and 10-6.220.

**Comment #: 3**

Reporting requirement 2), in plant wide Permit Condition PW001 and Reporting requirement 1) in Permit Condition 1 require submission of deviation reports as required by Section IV of this permit. However, the general record keeping and reporting requirements are included in Section V. EPA suggest MDNR correct the reference. EPA also suggests inserting the word “total” between the words “rolling” and “emissions” in the first line of the monitoring / record keeping requirement 1) of plant wide Permit Condition PW001.

**Response to Comment:**

The suggested corrections were made to the text of plantwide condition PW001 and Permit Condition 1.



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

[www.dnr.mo.gov](http://www.dnr.mo.gov)

**OCT 25 2016**

Mr. Douglas A. Rohr  
BlueScope Buildings North America Inc  
2250 SW Lower Lake Road  
St. Joseph, MO 64504

Re: BlueScope Buildings North America Inc, 021-0095  
Permit Number: OP2016-016

Dear Mr. Rohr:

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

A handwritten signature in black ink that reads "Michael J. Stansfield". The signature is written in a cursive style.

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

MJS:bjj

Enclosures



c: PAMS File: 2014-12-043