

**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES

## 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:** OP2017-073

**Expiration Date:** SEP 25 2022

**Installation ID:** 510-2378

**Project Number:** 2016-03-056

**Installation Name and Address**

Brandonview LLC - Gallery 720 Building  
720 Olive Street  
St. Louis, MO 63101  
City of St. Louis

**Parent Company's Name and Address**

Brandonview LLC  
720 Olive Street, Suite 120  
St. Louis MO, 63101

**Installation Description:**

The Gallery 720 Building, owned by Brandonview LLC, is a 31 floor high-rise office building located in downtown Saint Louis, Missouri. The building was named after its major tenant, the Laclede Gas Company, which left the building, March 2015.

The installation generates electricity and low pressure steam for heating and air conditioning. The building contains eight natural gas-fired internal combustion engines, two natural gas-fired boilers, three cooling towers, a parts washer, and miscellaneous ancillary equipment. The installation is a major source of Carbon Monoxide (CO) and Nitrogen Oxides (NOx).

Prepared by  
Berhanu A. Getahun  
Operating Permit Unit

Director or Designee  
Department of Natural Resources

SEP 25 2017

Effective Date

## Table of Contents

<b>I. INSTALLATION EQUIPMENT LISTING .....</b>	<b>3</b>
EMISSION UNITS WITH LIMITATIONS.....	3
EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS.....	3
<b>II. PLANT WIDE EMISSION LIMITATIONS.....</b>	<b>4</b>
<b>III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS .....</b>	<b>5</b>
EP-01 – SIX (6) INTERNAL COMBUSTION ENGINES (ENGINATORS).....	5
Permit Condition (EP-01) - 001 .....	5
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations .....	5
40 CFR Part 63, Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines .....	5
EP-02 – TWO (2) INTERNAL COMBUSTION ENGINES (NORTH AND SOUTH CENTRIFUGAL ENGINES) .....	10
Permit Condition (EP-02) - 001 .....	10
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations .....	10
40 CFR Part 63, Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines .....	10
EP-07 – PARTS WASHER .....	14
Permit Condition (EP-07) - 001 .....	14
10 CSR 10-5.300 Control of Emissions from Solvent Metal Cleaning.....	14
<b>IV. CORE PERMIT REQUIREMENTS .....</b>	<b>17</b>
<b>V. GENERAL PERMIT REQUIREMENTS.....</b>	<b>23</b>
<b>VI. ATTACHMENTS .....</b>	<b>28</b>
Attachment A - Solvent Containing Waste Transfer Log .....	29
Attachment B - Purchase Records for Cold Cleaning Solvent.....	30
Attachment C - Employee Solvent Metal Cleaning Training Log .....	31
Attachment D - Inspection/Maintenance/Repair/Malfunction Log.....	32

## I. Installation Equipment Listing

### EMISSION UNITS WITH LIMITATIONS

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

Emission Unit	Description of Emission Unit	Make/Model No./Serial No.	Installation Date
EP 01	Six (6) Internal Combustion Engines (Enginators)		
	Enginator #1 (EG-1)	Waukesha, L7042GU, 160572	1969
	Enginator #2 (EG-2)	Waukesha, L7042GU, 160571	1969
	Enginator #3 (EG-3)	Waukesha, L5108GSIU, 317048	1969
	Enginator #4 (EG-4)	Waukesha, L5108GSIU, 152312	1969
	Enginator #5 (EG-5)	Waukesha, L5108GSIU, 287988	1969
	Enginator #6 (EG-6)	Waukesha, L5108GSIU, 287872	1969
EP 02	Two (2) Internal Combustion Engines (North and South Centrifugal Engines)		
	North Centrifugal Engine (EG-N)	Waukesha, H2476G/52103	1969
	South Centrifugal Engine (EG-S)	Waukesha, H2476G/52114	1969
EP 07	Parts Washer	Build All Corp./SXL48/3867924	1983

### EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

Emission Unit	Description of Emission Unit
EP-03	North Boiler (BLR-N), 8,360 SCFH (8.5272 MMBtu/hr), Natural Gas-Fired
EP-03	South Boiler (BLR-S), 8,360 SCFH (8.5272 MMBtu/hr), Natural Gas-Fired
EP-08	Lube Oil Tank (1,000 gallon capacity)
EP-09	Waste Lube Oil Tank (550 gallon capacity)
EP-10	18.2 Horsepower (HP) Emergency Air Compressor (Gasoline)
EP-11	Three (3) Cooling Towers

## **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.

None

### 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>EP-01 – Six (6) Internal Combustion Engines (Enginators)</b> [with Non-Selective Catalytic Reduction (NSCR) Control Device]	
Emission Unit	Description
EP-01	Six (6) Spark Ignition (SI) 4-Stroke Rich Burn (4SRB) Stationary Reciprocating Internal Combustion Engines used for heating, cooling and power production: Enginator #1 (EG-1) and Enginator #2 (EG-2) – 767 Horsepower (HP) each, natural gas-fired Enginator #3 (EG-3) and Enginator #4 (EG-4) – 1006 HP each, natural gas-fired Enginator #5 (EG-5) and Enginator #6 (EG-6) – 1006 HP each, natural gas-fired

<b>Permit Condition (EP-01) - 001</b>
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

**Emission Limitation:**

- 1) Per Table 2d of Subpart ZZZZ, the permittee has installed Non-Selective Catalytic Reduction (NSCR) to reduce HAPs from the enginators and has elected to use the 30% total hydrocarbon (THC) reduction option. [§63.6603(a)]
- 2) The permittee shall base compliance with the emission limitations on one (1) test run using the testing requirements and procedures in §63.6620 and Table 4 of Subpart ZZZZ. [§63.6603]
- 3) The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup apply. [§63.6625(h)]
- 4) The permittee shall comply with the general provisions of 40 CFR 63.1 through 15 that apply as indicated in Table 8 of 40 CFR 63, Subpart ZZZZ. [§63.6665]

**Compliance Requirements:**

- 1) The permittee must be in compliance with the emission limitations, operating limitations, and other requirements in this subpart that apply to the permittee at all times. [§63.6605(a)]
- 2) At all times the permittee must operate and maintain the internal combustion engines, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Director which may include, but is not limited to, monitoring results, review of operation and maintenance

procedures, review of operation and maintenance records, and inspection of the source.  
[§63.6605(b)]

**Initial Compliance Demonstration:**

- 1) Pursuant to §63.6630(d), the permittee complying with the requirement to reduce formaldehyde emissions by 76 percent or more demonstrated initial compliance with the formaldehyde emission limit by testing for total hydrocarbon (THC) instead of formaldehyde. The testing has been conducted according to the requirements in Table 4 of Subpart ZZZZ of Part 63. The average reduction of emissions of THC determined from the performance test was equal to or greater than 30 percent. [§63.6630(d)]
- 2) To comply with Item 14 of Table 5 to Subpart ZZZZ of Part 63, the permittee installed non-Selective catalytic reduction (NSCR) with continuous parameter monitoring system (CPMS) to demonstrate initial compliance as specified in §63.6630(e) by showing the average reduction of emissions of total hydrocarbon (THC) was 30 percent or more.

**Monitoring and Operational Limitations:**

- 1) Non-Selective Catalytic Reduction (NSCR) - The emission limitations, the permittee shall comply with the following operational limitation: [§63.6603(a)]
  - a) The permittee shall maintain the temperature of the stationary RICE exhaust so that the catalyst inlet temperature is greater than or equal to 750 degrees Fahrenheit (°F) and less than or equal to 1250 °F.
- 2) Continuous Parameter Monitoring System (CPMS) - The permittee must install, operate, and maintain each CPMS according to the requirements in paragraphs (b)(1) through (6) of §63.6625 (listed below). [§63.6625(b)]
  - a) The permittee must prepare a site-specific monitoring plan that addresses the monitoring system design, data collection, and the quality assurance and quality control elements outlined in paragraphs (b)(1)(i) through (v) of §63.6625 (listed below) and in §63.8(d). As specified in §63.8(f)(4), the permittee may request approval of monitoring system quality assurance and quality control procedures alternative to those specified in paragraphs (b)(1) through (5) of §63.6625 in the permittee's site-specific monitoring plan. [§63.6625(b)(1)]
    - i) The performance criteria and design specifications for the monitoring system equipment, including the sample interface, detector signal analyzer, and data acquisition and calculations; [§63.6625(b)(1)(i)]
    - ii) Sampling interface (e.g., thermocouple) location such that the monitoring system will provide representative measurements; [§63.6625(b)(1)(ii)]
    - iii) Equipment performance evaluations, system accuracy audits, or other audit procedures; [§63.6625(b)(1)(iii)]
    - iv) Ongoing operation and maintenance procedures in accordance with provisions in §63.8(c)(1)(ii) and (c)(3); and [§63.6625(b)(1)(iv)]
    - v) Ongoing reporting and recordkeeping procedures in accordance with provisions in §63.10(c), (e)(1), and (e)(2)(i). [§63.6625(b)(1)(v)]
  - b) The permittee must install, operate, and maintain each CPMS in continuous operation according to the procedures in the permittee's site-specific monitoring plan. [§63.6625(b)(2)]
  - c) The CPMS must collect data at least once every 15 minutes (see also §63.6635). [§63.6625(b)(3)]
  - d) For a CPMS for measuring temperature range, the temperature sensor must have a minimum tolerance of 2.8 degrees Celsius (5 degrees Fahrenheit) or 1 percent of the measurement range, whichever is larger. [§63.6625(b)(4)]

- e) The permittee must conduct the CPMS equipment performance evaluation, system accuracy audits, or other audit procedures specified in your site-specific monitoring plan at least annually. [§63.6625(b)(5)]
- f) The permittee must conduct a performance evaluation of each CPMS in accordance with the permittee's site-specific monitoring plan. [§63.6625(b)(6)]
- 3) Except for monitor malfunctions, associated repairs, required performance evaluations, and required quality assurance or control activities, the permittee shall monitor continuously at all times that the stationary RICE is operating. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [§63.6635(b)]
- 4) The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities in data averages and calculations used to report emission or operating levels. The permittee shall, however, use all the valid data collected during all other periods. [§63.6635(c)]

**Continuous Compliance:**

- 1) The permittee shall demonstrate continuous compliance with each emission limitation and operating limitation according to the following methods: [§63.6640(a) and Item 15 of Table 6 of 40 CFR Part 63, Subpart ZZZZ]
  - a) Conducting annual compliance demonstrations as specified in §63.6640(c) to show that the average reduction of emissions of THC is 30 percent or more; and either
  - b) Collecting the catalyst inlet temperature data according to §63.6625(b), reducing and maintaining these data to four-hour rolling averages within the limitation of greater than or equal to 750 °F and less than or equal to 1250 °F for the catalyst inlet temperature; or
  - c) Immediately shutting down the engine if the catalyst inlet temperature exceeds 1250 °F.
- 2) The permittee shall conduct the required annual compliance demonstration according to the following requirements: [§63.6640(c)]
  - a) The compliance demonstration must consist of at least one test run. [§63.6640(c)(1)]
  - b) Each test run must be of at least 15 minute duration, except that each test conducted using the method in appendix A to this subpart must consist of at least one measurement cycle and include at least 2 minutes of test data phase measurement. [§63.6640(c)(2)]
  - c) The permittee must measure THC emissions using Method 25A, reported as propane, of 40 CFR Part 60, appendix A. [§63.6640(c)(4)]
  - d) The permittee must measure O<sub>2</sub> using one of the O<sub>2</sub> measurement methods specified in Table 4 of Subpart ZZZZ of Part 63. Measurements to determine O<sub>2</sub> concentration must be made at the same time as the measurements for THC concentration. [§63.6640(c)(5)]
  - e) The permittee must measure THC emissions and O<sub>2</sub> emissions simultaneously at the inlet and outlet of the control device. [§63.6640(c)(6)]
  - f) If the results of the annual compliance demonstration show that the average reduction of emissions of THC is less than 30 percent, the engine(s) must be shut down as soon as safely possible, and appropriate corrective action must be taken (e.g., repairs, catalyst cleaning, catalyst replacement). The engine(s) must be retested within 7 days of being restarted and the average reduction of emissions of THC must meet the 30 percent or more level specified in Table 6 of Subpart ZZZZ of Part 63. If the retest shows that the average reduction of emissions of THC falls below the 30 percent reduction level, the stationary engine(s) must again be shut down as soon as safely possible, and the engine(s) may not operate, except for purposes of startup and testing, until the permittee demonstrates through testing that the THC emissions reduction does

not fall below the 30 percent or more level specified in Table 6 of Subpart ZZZZ of Part 63.  
[§63.6640(c)(7)]

**Notifications:**

- 1) The permittee shall submit all of the notifications in §§63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), 63.9(b) through (e), and (g) and (h) that apply by the dates specified. [§63.6645(a)]
- 2) The permittee shall submit a Notification of Intent to conduct a performance test at least 60 days before the performance test is scheduled to begin as required in §63.7(b)(1). [§63.6645(g)]
- 3) The permittee shall submit a Notification of Compliance Status according to §63.9(h)(2)(ii). [§63.6645(h)]
  - a) The Notification of Compliance Status shall include the performance test results and shall be submitted before the close of business on the 60th day following the completion of the performance test according to §63.10(d)(2).

**Recordkeeping:**

- 1) The permittee shall retain the following records: [§63.6655]
  - a) A copy of each notification and report the permittee has submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status according to the requirements of §63.10(b)(2)(xiv).
  - b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the NSCR and CPMS monitoring equipment.
  - c) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii).
  - d) Records of all required maintenance and adjustments performed on the NSCR and CPMS monitoring equipment.
  - e) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
- 2) For each CPMS, the permittee shall retain the following records:
  - a) Records described in §63.10(b)(2)(vi) through (xi) and §63.10(c).
  - b) Previous (i.e., superseded) versions of the performance evaluation plan as required in §63.8(d)(3).
  - c) Requests for alternatives to the relative accuracy test for CPMS as required in §63.8(f)(6)(i), if applicable.
  - d) Records required per §63.6655, as applicable.
- 3) The permittee's records shall be in a form suitable and readily available for expeditious review according to §63.10(b)(1). [§63.6660(a)]
- 4) As specified in §63.10(b)(1), the permittee must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.6660(b)]
- 5) The permittee shall retain each record, readily accessible, in hard copy or electronic form for at least five years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660(c)]
- 6) These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.

**Reporting:**

- 1) The permittee shall report each instance in which the permittee did not meet each emission limitation or operating limitation. These instances are deviations from the emission and operating limitations in this subpart. These deviations shall be reported according to the requirements in §63.6650. If the permittee changes catalysts, the permittee shall reestablish the values of the operating parameters



measured during the initial performance test. When the permittee reestablishes the values of these operating parameters, the permittee shall also conduct a performance test to demonstrate that the permittee is meeting the required emission limitation. [§63.6640(b)]

- 2) The permittee must also report each instance in which the permittee did not meet the requirements in Table 8 to Subpart ZZZZ of Part 63, *Applicability of General Provisions to Subpart ZZZZ*, that apply to the permittee.
- 3) The permittee shall submit semi-annual and annual compliance reports. [§63.6650]
  - a) Each compliance report shall contain:
    - i) Company name and address.
    - ii) A statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report.
    - iii) Date of report and beginning and ending dates of the reporting period.
    - iv) If there were no deviations from any emission or operating limitations during the reporting period, the report shall contain a statement that there were no deviations from the operating limitations during the reporting period.
    - v) If there were no periods during which the CPMS was out-of-control, as specified in §63.8(c)(7), a statement that there were not periods during which the CPMS was out-of-control during the reporting period
    - vi) If there were periods during which the CPMS was out-of-control, as specified in §63.8(c)(7), the report shall contain the following information:
      - (1) The date and time that each malfunction started and stopped.
      - (2) The date, time, and duration that each CPMS was inoperative, except for zero (low-level) and high-level checks.
      - (3) The date, time, and duration that each CPMS was out-of-control, including the information in §63.8(c)(8).
      - (4) The date and time that each deviation started and stopped, and whether each deviation occurred during a period of malfunction or during another period.
      - (5) A summary of the total duration of the deviation during the reporting period, and the total duration as a percent of the total source operating time during that reporting period.
      - (6) A breakdown of the total duration of the deviations during the reporting period into those that are due to control equipment problems, process problems, other known causes, and other unknown causes.
      - (7) A summary of the total duration of CPMS downtime during the reporting period, and the total duration of CPMS downtime as a percent of the total operating time of the stationary RICE at which the CPMS downtime occurred during that reporting period.
      - (8) An identification of each parameter and pollutant (THC) that was monitored at the stationary RICE.
      - (9) A brief description of the stationary RICE.
      - (10) A brief description of the CPMS including the manufacturer and model number.
      - (11) The date of the latest CPMS certification or audit.
      - (12) A description of any changes in CPMS, processes, or controls since the last reporting period.
    - vii) If the permittee had a malfunction during the reporting period, the compliance report shall contain 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 or operating limitation to be exceeded. The report shall also include a description of

actions taken by the permittee during the malfunction of the affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction.

- b) Pursuant to §63.6650(b)(5), the permittee shall submit semiannual reports according to the dates specified in Section V of this Permit:
  - i) Each subsequent compliance report shall cover the semi-annual reporting period from January 1 through June 30 or the semi-annual reporting period from July 1 through December 31. These reports shall be submitted in conjunction with the semi-annual Title V compliance reports required by Section V of this permit.
- 4) The permittee’s compliance report shall contain the results of the annual compliance demonstration, if conducted during the reporting period.
- 5) The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Missouri Air Compliance Coordinator at EPA Region 7 with complimentary copies to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by Section V of this permit instead of according to the dates specified in in paragraphs (b)(1) through (b)(4) of §63.6650.

<b>EP-02 – Two (2) Internal Combustion Engines (North and South Centrifugal Engines)</b>	
Emission Unit	Description
EP-02	Two (2) Spark Ignition (SI) 4-Stroke Rich Burn (4SRB) Stationary Reciprocating Internal Combustion Engines used for gas compression: North Centrifugal Engine (EG-N) – 412 HP, natural gas-fired South Centrifugal Engine (EG-S) – 412 HP, natural gas-fired

<b>Permit Condition (EP-02) - 001</b>
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

**Operational Limitation:**

- 1) The permittee must comply with the requirements in Item 10 of Table 2d to Subpart ZZZZ of Part 63 which apply to the facility (listed below). [§63.6603(a)]

For each .....	The permittee must meet the following requirement, except during periods of startup	During periods of startup the permittee must
Non-emergency, non-black start 4SRB stationary RICE ≤ 500 HP	a. Change oil and filter every 1,440 hours of operation or annually, whichever comes first; <sup>1</sup> b. Inspect spark plugs every 1,440 hours of operation or annually, whichever comes first, and replace as necessary; and c. Inspect all hoses and belts every 1,440 hours of operation or annually, whichever comes first, and replace as necessary.	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

<sup>1</sup> The permittee has the option to utilize an oil analysis program as described in 40 CFR §63.6625(j) in order to extend the specified oil change requirement in Table 2d of 40 CFR Part 63, Subpart ZZZZ.

Pursuant to 40 CFR §63.6625(j), the oil analysis must be performed at the same frequency specified for changing the oil in Table 2d (see table above) to 40 CFR Subpart ZZZZ of Part 63. The analysis program must at a minimum analyze the following three parameters: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 business days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine.

- 2) At all times the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.6605(b)]
- 3) The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related operation and maintenance instructions or develop their own maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e) and §63.6640(a)]
- 4) The permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Item 10 of Table 2d to Subpart ZZZZ of 40 CFR Part 63 apply. [§63.6625(h)]

- 5) The permittee shall comply with the general provisions of 40 CFR 63.1 through 15 that apply as indicated in Table 8 of 40 CFR 63, Subpart ZZZZ. [§63.6665]

**Continuous Compliance Requirements:**

- 1) The permittee must be in compliance with the operating limitations at all times. [§63.6605(a)]  
 2) The permittee must demonstrate continuous compliance with the operational limitation in Table 2d to Subpart ZZZZ of 40 CFR Part 63 that apply to the permittee according to methods specified in Table 6 to Subpart ZZZZ of 40 CFR Part 63 (item 9) (listed below). [§63.6640(a)]

For Each...	Complying with the requirements to ...	The permittee must demonstrate continuous compliance by ...
Existing non-emergency stationary 4SRB RICE ≤ 500 HP located at an area source of HAP	Work or Management practices	<ul style="list-style-type: none"> <li>i Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or</li> <li>ii Develop and follow the permittee's own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.</li> </ul>

**Recordkeeping:**

- 1) The permittee must keep the records described in paragraphs (a)(1), (a)(2) and (a)(5) of §63.6655. [§63.6655(a)]
- a) A copy of each notification and report that the permittee submitted to comply with Subpart ZZZZ of 40 CFR Part 63, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirement in 40 CFR §63.10(b)(2)(xiv). [§63.6655(a)(1)]
  - b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
  - c) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b). [§63.6655(a)(5)]
- 2) The permittee must keep the records required in Table 6 of Subpart ZZZZ of 40 CFR Part 63 to show continuous compliance with each emission or operating limitation that applies to the permittee. [§63.6655(d)]
- 3) The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to the permittee's own maintenance plan. These shall be met if the permittee develops its own maintenance plan for the engines. [§63.6655(e)]
- 4) The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR §63.10(b)(1). [§63.6660(a)]
- 5) As specified in 40 CFR §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. [§63.6660(b)]
- 6) The permittee must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR §63.10(b)(1). [§63.6660(c)]

**Reporting:**

- 1) The permittee must report each instance in which the permittee did not meet above listed operational limitations. These instances are deviations from the operating limitations in Subpart ZZZZ of 40 CFR Part 63. These deviations must be reported according to the requirements in §63.6650. [§63.6640(b)]
- 2) The permittee must also report each instance in which the permittee did not meet the requirements in Table 8 to Subpart ZZZZ of 40 CFR Part 63 — Applicability of General Provisions to Subpart ZZZZ that apply to the permittee. [§63.6640(e)]
- 3) *Reporting requirements* [§63.6650]
  - a) Pursuant to §63.6650(b)(5), the permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Missouri Air Compliance Coordinator at EPA Region 7 with complimentary copies to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by Section V of this permit instead of according to the dates specified in in paragraphs (b)(1) through (b)(4) of §63.6650.
  - b) The Compliance report must contain the information in paragraphs (c)(1) through (6) of §63.6650. [§63.6650(c)]
    - i) Company name and address. [§63.6650(c)(1)]
    - ii) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report. [§63.6650(c)(2)]
    - iii) Date of report and beginning and ending dates of the reporting period. [§63.6650(c)(3)]
    - iv) If the permittee had a malfunction during the reporting period, the compliance report must include 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 emissions in accordance with §63.6605(b), including actions taken to correct a malfunction. [§63.6650(c)(4)]
    - v) If there are no deviations from any emission or operating limitations that apply to the permittee, a statement that there were no deviations from the emission or operating limitations during the reporting period. [§63.6650(c)(5)]
  - c) For each deviation from operating limitation that occurs for the stationary RICE where the permittee is not using a CMS to comply with the emission or operating limitations in Subpart ZZZZ of 40 CFR Part 63, the Compliance report must contain the information in paragraphs (c)(1) through (4) of §63.6650 and the information in paragraphs (d)(1) and (2) of §63.6650 (listed below). [§63.6650(d)]
    - i) The total operating time of the stationary RICE at which the deviation occurred during the reporting period. [§63.6650(d)(1)]
    - ii) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [§63.6650(d)(2)]
  - d) The permittee must report all deviations as defined in Subpart ZZZZ of 40 CFR Part 63 in the semiannual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). [§63.6650(f)]

<b>EP-07 – Parts Washer</b>		
Emission Unit	Description	Manufacturer/ Model #
EP-07	One Parts Washer – 30 gallon capacity, installed 1983	Build-All Corporation SXL48/3867924

**Permit Condition (EP-07) - 001**

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

*This regulation is applicable to cold cleaners using non-aqueous solvents. This parts washer is currently using a non-aqueous, solvent based cleaning solution and the installation abides by the requirements of 10 CSR 10-5.300 as applicable to the parts washer. If the installation ceases using non-aqueous solvents, the requirements of 10 CSR 10-5.300 will no longer apply; however, the permittee shall retain safety data sheets (SDS) on the cold cleaner solvent to verify its' aqueous nature.*

**Emission Limitation:**

- 1) The permittee shall not use cold cleaning solvent with a vapor pressure greater than 1.0 millimeters of Mercury (mmHg) (0.019 psi) at 20 degrees Celsius (20°C) (68 degrees Fahrenheit (68°F)) unless used for carburetor cleaning. [10 CSR 10-5.300(3)(A)1.A]
- 2) Exception: The permittee may use an alternative method for reducing cold cleaning emissions if the level of emission control is equivalent to or greater than the requirements of subparagraph (3)(A)1.A and (3)(A)1.B of 10 CSR 10-5.300. The director and the U.S Environmental Protection Agency (EPA) must approve the alternative method. [10 CSR 10-5.300(3)(A)1.D]

**Operational Limitation/Equipment Specification:**

The permittee shall comply with the following operational limitations and equipment specifications unless an exemption under 10 CSR 10-5.300(1)(D) applies:

- 1) Equipment specifications [10 CSR 10-5.300(3)(A)1]:
  - a) Each cold cleaner shall have a cover, which shall prevent the escape of solvent vapors from the solvent bath while in the closed position, or an enclosed reservoir, which shall limit the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner. [10 CSR 10-5.300(3)(A)1.C]
  - b) Exemptions under (1)(D) of the regulation may apply.
  - c) Alternate methods for reducing cold cleaning emissions may be used if the permittee shows the emission control is at least equivalent to the control in (a) above and is approved by the Director and the EPA. [10 CSR 10-5.300(3)(A)1.D]
  - d) When one (1) or more of the following conditions exist, the cover shall be designed to operate easily such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten (10) square feet, this shall be accomplished by either mechanical assistance or by a power system). [10 CSR 10-5.300(3)(A)1.E]
    - i) The solvent vapor pressure is greater than 0.3 psi measured at one hundred degrees Fahrenheit (100°F). [10 CSR 10-5.300(3)(A)1.E(I)]
    - ii) The solvent is agitated. [10 CSR 10-5.300(3)(A)1.E(II)]
    - iii) The solvent is heated. [10 CSR 10-5.300(3)(A)1.E(III)]
  - e) Each cold cleaner shall have an internal drainage facility so that parts are enclosed under the cover while draining. [10 CSR 10-5.300(A)1.F]

- f) If an internal drainage facility as in 10 CSR 10-5.300(3)(A)1.F cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at one hundred degrees Fahrenheit (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath. [10 CSR 10-5.300(3)(A)1.G]
  - g) Solvent sprays shall be a solid fluid stream (not a fine, atomized or shower type spray) and at a pressure which does not cause splashing above or beyond the freeboard. [10 CSR 10-5.300(3)(A)1.H]
  - h) A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment. [10 CSR 10-5.300(3)(A)1.I]
  - i) Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at one hundred degrees Fahrenheit (100°F) or heated above one hundred twenty degrees Fahrenheit (120°F) must use one (1) of the following control devices: [10 CSR 10-5.300(3)(A)1.J]
    - i) A freeboard ratio of at least 0.75; [10 CSR 10-5.300(3)(A)1.J(I)]
    - ii) Water cover (solvent must be insoluble in and heavier than water); or [10 CSR 10-5.300(3)(A)1.J(II)]
    - iii) Other control system that has a mass balance demonstrated overall VOC emission reduction efficiency of at least sixty-five percent (65%) and is approved by the Director and EPA prior to use. [10 CSR 10-5.300(3)(A)1.J(III)]
- 2) Operating procedures: [10 CSR 10-5.300(3)(B)1]
- a) Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners, or solvent must drain into an enclosed reservoir except when performing maintenance or collecting solvent samples. [10 CSR 10-5.300(3)(B)1.A].
  - b) Cleaned parts shall be drained in the free board area for at least fifteen (15) seconds, or until dripping stops, whichever is longer. [10 CSR 10-5.300(3)(B)1.B]
  - c) Whenever a cold cleaner fails to perform within the operating parameters established by 10 CSR 10-5.300, the unit shall be shut down and shall remain shut down until operation is restored to meet 10 CSR 10-5.300's operating requirements. [10 CSR 10-5.300(3)(B)1.C]
  - d) Solvent leaks shall be repaired immediately, or the cold cleaner shall be shut down until the leaks are repaired. [10 CSR 10-5.300(3)(B)1.D]
  - e) Waste material removed from a cold cleaner shall be disposed of by one of the methods listed in 10 CSR 10-5.300 or equivalent method approved by the director and EPA. [10 CSR 10-5.300(3)(B)1.E]
  - f) Waste solvent shall be stored in closed containers only. [10 CSR 10-5.300(3)(B)1.F]
- 3) Operator and Supervisor Training: [10 CSR 10-5.300(3)(C)]
- a) Persons who operate a cold cleaner shall be trained in the operational and equipment requirements specified in 10 CSR 10-5.300 for the permittee's particular solvent metal cleaning process. [10 CSR 10-5.300(3)(C)1]
  - b) The supervisor of any person who operates a cold cleaner shall receive equal or greater operational training than the operator. [10 CSR 10-5.300(3)(C)2]
  - c) Persons who operate a cold cleaner shall receive a procedural review at least once each twelve (12) months. [10 CSR 10-5.300(3)(C)3]

**Monitoring/ Recordkeeping:**

- 1) The permittee shall maintain the following records for each purchase of cold cleaner solvent (Attachment B): [10 CSR 10-5.300(4)(B)]
  - a) Name and address of the solvent supplier. [10 CSR 10-5.300(4)(B)1]

- b) Date of purchase. [10 CSR 10-5.300(4)(B)2]
  - c) Type of solvent purchased. [10 CSR 10-5.300(4)(B)3]
  - d) Vapor pressure of solvent in mm Hg at 20°C or 68°F. [10 CSR 10-5.300(4)(B)4]
- 2) The permittee shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. (see Attachment A). The record also shall include maintenance and repair logs that occurred on the degreaser and any associated control equipment (Attachment D). These records shall be kept current and made available for review on a monthly basis. The director may require additional recordkeeping if necessary to adequately demonstrate compliance with 10 CSR 10-5.300. [10 CSR 10-5.300(4)(A)]
- 3) The permittee shall keep records of solvent metal cleaning training as required by 10 CSR 10-5.300(3)(C) (Attachment C) [10 CSR 10-5.300(4)(D)].
- 4) All records shall be retained for five years and be available to the director upon request. [10 CSR 10-5.300(4)E]

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as 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 and St. Louis City Ordinance 68657 §16 Open Burning Restrictions**

- 1) No person shall cause, suffer, allow or permit the open burning of refuse.
- 2) No person shall conduct, cause or permit the conduct of a salvage operation by open burning.
- 3) No person shall conduct, cause or permit the disposal of trade waste by open burning.
- 4) No person shall cause or permit the open burning of leaves, trees or the byproducts therefrom, grass, or other vegetation.
- 5) It shall be prima-facie evidence that the person who owns or controls property on which open burning occurs, has caused or permitted said open burning.

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

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.

#### **10 CSR 10-6.100 Alternate Emission Limits**

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

#### **10 CSR 10-6.110 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**

- 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 10-6.250 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.

### **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”;
  - b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.

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

No owner or operator shall operate applicable hand-fired fuel burning equipment unless the owner or operator meets the conditions set forth in 10 CSR 10-5.040. This regulation shall apply to all hand-fired fuel-burning equipment at commercial facilities including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing or to other equipment exempted under 10 CSR 10-5.040. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

**10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations  
(Rescinded on February 11, 1979, Contained in State Implementation Plan)**

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

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

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
  - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (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**

#### **10 CSR 10-6.065(6)(E)3.C Extension of Expired Permits**

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

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

#### 1) Record Keeping

- a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
- b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.

#### 2) Reporting

- a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
- 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**

The permittee is considering switching from a nonaqueous solvent within EP-07 Parts Washer to an aqueous solvent. If the permittee switches to an aqueous solvent, then the permittee is no longer required to comply with 10 CSR 10-5.300 Control of Emissions From Solvent Metal Cleaning. Verification of switching to an aqueous solvent shall consist of the permittee maintaining safety data sheets on the parts washer solvent.

### **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 Brian P. Hayden, Managing Partner. 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.











## STATEMENT OF BASIS

### INSTALLATION DESCRIPTION

The Gallery 720 Building, owned by Brandonview LLC, is a 31 floor high-rise office building located in downtown Saint Louis, Missouri. The building was named after its major tenant, the Laclede Gas Company, which left the building, March 2015.

The Laclede Gas Building (LGB), as it was called, was constructed in the late 1960's. The power plant in the building, with the combined heat and power (CHP) facility at its core, is part of the original building design. The power plant serves all of the building's electricity, heating, hot water, and cooling requirements.

The Gallery 720 Building is located at 720 Olive Street in Saint Louis, Missouri. This address is in the heart of the downtown office district and about 1500 feet from the Saint Louis Gateway Arch landmark.

The plant serves a total of 500,000 square feet of floor space located across 30 floors. The 31st floor houses the heating, ventilation, and air conditioning (HVAC) equipment. The plant operates in a stand-alone mode, which means it is NOT interconnected to the local electricity provider, Ameren Missouri. Backup power is provided by the multi-unit configuration of the power plant. The primary fuel for the power plant is natural gas, which is purchased from Center Point Energy Gas Marketing and distributed to the building by Laclede Gas Company. The Gallery 720 Building has a relatively high occupancy load factor due to extended operating hours during the week. The load factor, however, drops significantly on weekends.

The energy system at Gallery 720 Building consists of six ebullient cooled engines with heat recovery units, one absorption chiller, two mechanical chillers, and two additional boilers. The power plant was configured with the building and started operation in 1969. Since then, two engines have essentially been replaced; the other four engines received parts replacements in accordance with the maintenance schedule. The building CHP system runs 24 hours per day, 365 days a year. Engine use is rotated to assure homogenous wear and tear on the equipment.

Electricity generated by the electric generation prime movers meets all of the electric demand of the building. This is critical since the building is a stand-alone electric generation facility; it is not interconnected to the local electrical distribution system. As such, the power plant does not provide any electricity for resale to third parties.

The prime movers employed at the Gallery 720 Building power plant are as follows:

- 4 Waukesha VHP engine-generators rated at 800 kW/1200 rpm (VHP is an internal Waukesha engine designation).
- 2 Waukesha VHP engine-generators rated at 550 kW/ 900 rpm.

Since the original installation, the engines have been significantly upgraded. The upgrades include solid state igniters, solid state speed switches, upgrade carburetors, and starters.

The Waukesha engines operate on 900 Btu/ft<sup>3</sup> minimum of commercial quality natural gas at 25 pounds per square inch gage (psig).

The power plant is operated in a completely islanded condition with no backup (other than redundancy built into the CHP system) or standby power supply arrangements in place.

Non-recovery thermal systems consist of the following equipment:

- 2 boilers rated at 200 horsepower each.
- 2 natural gas engine driven chillers rated at 350 tons each and manufactured by York. In 1989, the two centrifugal engines were converted from constant speed to variable speed to allow for effective load management.
- Plant heat is rejected through two Marley lube oil cooling towers located on the third floor roof of the building.

### Updated Potential to Emit for the Installation

Pollutant	Potential to Emit (tons/year) <sup>1</sup>
Particulate Matter $\leq$ Ten Microns (PM <sub>10</sub> )	6.00
Particulate Matter $\leq$ 2.5 Microns (PM <sub>2.5</sub> )	5.56
Sulfur Oxides (SO <sub>x</sub> )	0.24
Nitrogen Oxides (NO <sub>x</sub> )	585.67
Volatile Organic Compounds (VOC)	9.86
Carbon Monoxide (CO)	953.04
Hazardous Air Pollutants (HAPs)	8.39
Ammonia (NH <sub>3</sub> )	0.04
Greenhouse Gases (CO <sub>2</sub> e)	38,661.97

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

### Reported Air Pollutant Emissions, tons per year

Pollutants	2016	2015	2014	2013	2012
Particulate Matter $\leq$ Ten Microns (PM <sub>10</sub> )	3.90	4.18	3.96	3.71	4.05
Particulate Matter $\leq$ 2.5 Microns (PM <sub>2.5</sub> )	2.91	3.04	2.95	2.85	3.11
Sulfur Oxides (SO <sub>x</sub> )	0.04	0.04	0.04	0.05	0.05
Nitrogen Oxides (NO <sub>x</sub> )	165.24	156.57	169.77	181.66	198.37
Volatile Organic Compounds (VOC)	1.14	1.02	2.21	2.37	2.59
Carbon Monoxide (CO)	255.50	242.10	262.50	280.88	306.72

Pollutants	2016	2015	2014	2013	2012
Lead (Pb)	0.00	0.00	0.00	0.00	0.00
Hazardous Air Pollutants (HAPs)	0.00	0.00	0.00	0.00	0.00
Ammonia (NH <sub>3</sub> )	0.00	0.00	0.00	0.00	0.00

### Permit Reference Documents

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

- 1) Part 70 Operating Permit Renewal Application, received March 22, 2016, revised November 15, 2016;
- 2) 2015 Emissions Inventory Questionnaire, received April 29, 2016; and
- 3) 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.

- 1) St. Louis City Ordinances Nos. 64749, 65108, 65488, 65442 and 65645  
These ordinances were reviewed and considered at the time the application for this permit was submitted. Since that time, these ordinances have been repealed and replaced with St. Louis City Ordinance No. 68657. The only section of Ordinance 68657 that corresponds to a rescinded ordinance included in the State SIP and therefore federally enforceable is Section 16 - Open Burning Restrictions. This section of the new ordinance is the only section included in the operating permit at this time.
- 2) 10 CSR 10-5.220, *Control of Petroleum Liquid Storage Loading and Transfer*.  
This rule is not applicable to the installation and has not been applied within this permit. This regulation is applicable to gasoline storage, loading, and transfer. The installation does use gasoline in the 18.2 HP Gasoline Fired Emergency Air Compressor (EP-10); however, there is no gasoline storage at the installation.

3) 10 CSR 10-5.450, *Control of VOC Emissions From Traffic Coating.*

This rule is not applicable to the installation. The installation has an underground garage used for parking vehicles. There is some paint used to stripe the parking spaces in the garage, but it is used in small quantities.

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

This rule applies to installations in the St. Louis City and the Counties of Jefferson, St. Charles, Franklin, and St. Louis with any cleaning operation involving the use of a volatile organic compound (VOC) solvent or solvent solution. The provisions of this rule shall not apply to any stationary source at which cleaning solvent VOCs are emitted at less than five hundred (500) pounds per day.

VOC emissions from the cleaning operation are less than the applicability threshold of 500 lbs/day. Therefore, this regulation does not apply to this installation.

5) 10 CSR 10-5.500, *Control of Emissions From Volatile Organic Liquid Storage.*

This rule is not applicable to the installation and has not been applied within this permit. This regulation is applicable to volatile organic liquid tanks greater than or equal to 40,000 gallons. [10 CSR 10-5.500(1)(B)]. The installation’s largest tank is only 1,000 gallons.

6) 10 CSR 10-5.510, *Control of Emissions of Nitrogen Oxides.*

This rule is not applicable to the installation and has not been applied within this permit. This regulation is applicable to installations with potential nitrogen oxides (NO<sub>x</sub>) emissions of 100 tons or greater. [10 CSR 10-5.510(1)(A)] The installation is a major source of NO<sub>x</sub>; however, each of the installation’s NO<sub>x</sub> emission sources meets an exemption under the regulation:

Emission Unit	Description	Exemption
EP-01	6.63 MMBtu/hr Engine	10 CSR 10-5.510(1)(C)2: “Any stationary internal combustion engine having a rated energy output capacity of less than 500 horsepower or a maximum heat input capacity of 20 MMBtu/hr or less.”
	6.63 MMBtu/hr Engine	
	9.55 MMBtu/hr Engine	
	9.55 MMBtu/hr Engine	
	9.55 MMBtu/hr Engine	
	9.55 MMBtu/hr Engine	
EP-02	3.31 MMBtu/hr Engine	
	3.31 MMBtu/hr Engine	
EP-10	18.2 HP Emergency Air Compressor (Gasoline)	
EP-03	8.53 MMBtu/hr North Boiler	
	8.53 MMBtu/hr South Boiler	

7) 10 CSR 10-5.520, *Control of Volatile Organic Compounds From Existing Major Sources.*

This rule applies to any installation in the counties of St. Charles, St. Louis, Franklin, or Jefferson or the City of St. Louis that have the potential to emit greater than one hundred (100) tons per year of volatile organic compounds and does not meet one or more of subsections (1)(A), (1)(B) or (1)(C) of this rule. The Gallery 720 Building VOC PTE is much lower than 100 tons per year; therefore, it is not subject to this rule.

- 8) 10 CSR 10-5.570, *Control of Sulfur Emissions From Stationary Boilers* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to boilers with nameplate capacities greater than 50 MMBtu/hr. [10 CSR 10-5.570(1)(A)] The installation's boilers are each only 8.53 MMBtu/hr.
- 9) 10 CSR 10-6.360, *Control of NO<sub>x</sub> Emissions From Electric Generating Units and Non-Electric Generating Boilers* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to electric generating units serving a generator with a nameplate capacity greater than 25 MW and non-electric generating boilers having a maximum design heat input greater than 250 MMBtu/hr. Each of the boilers at the installation, reported under EP-03, is 8.53 MMBtu/hr.
- 10) 10 CSR 10-6.390, *Control of NO<sub>x</sub> Emissions From Large Stationary Internal Combustion Engines* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to large stationary internal combustion engines greater than 1,300 HP. The largest internal combustion engines at the installation are the four 1,006 HP internal combustion engines reported under EP-01.
- 11) 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes*. Not applicable. The boilers (EP-03) and internal combustion engines (EP-01 and EP-02) in the Gallery 720 Building operate only on natural gas. The definition of process weight excludes liquids and gases that are used solely as fuels and air introduced for the purposes of combustion. Thus, the boilers and internal combustion engines are exempt from this regulation. The cooling tower (emission unit CWT-1) (EP-11) is also exempt from this regulation per 10CSR10-6.400 (1)(B)7. because it a source of fugitive emissions. The North & South Evaporative Towers (EVC-N, EVC-S) are exempt because they emit less than 0.5 lbs/hr PM-10 on a potential basis.

### **Construction Permit History**

The installation does not have any construction permits issued to it at this time.

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

- 1) 40 CFR Part 60, Subpart D, *Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971*.

The provisions of this subpart apply to each fossil-fuel-fired steam generating unit of more than 73 megawatts heat input rate (250 million Btu per hour) constructed or modified after August 17, 1971 and not covered under Subpart D.

None of the boilers (EP-03) are rated at greater than 73 megawatts heat input rate (250 million Btu per hour); therefore, this subpart does not apply to this installation.

- 2) 40 CFR Part 60, Subpart Da, *Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978*.

The provisions of this subpart apply to each electric utility fossil-fuel (either alone or in combination with any other fuel) fired steam generating unit of more than 73 megawatts heat input rate (250 million Btu per hour) constructed, reconstructed or modified after September 18, 1978.

None of the boilers (EP-03) are electric utility steam generating units as defined in this subpart nor

are they rated at greater than 73 megawatts heat input rate (250 million Btu per hour); therefore, this subpart does not apply to this installation.

- 3) 40 CFR Part 60, Subpart Db, *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units.*

The provisions of this subpart apply to each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 29 MW (100 million Btu per hour).

None of the boilers (EP-03) are rated at greater than 29 megawatts heat input rate (100 million Btu per hour); therefore, this subpart does not apply to this installation.

- 4) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*

Subpart Dc applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu/hr) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).

This regulation does not apply to the boilers (EP-03) at this installation, because they are less than 10 MMBtu each and were installed in 1969, which is prior to the NSPS date of June 9, 1989.

- 5) 40 CFR Part 60, Subparts K, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction Or Modification Commenced After June 11, 1973, and Prior to May 19, 1978.*

40 CFR Part 60, Subpart Ka, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction Or Modification Commenced After May 18, 1978, and Prior to July 23, 1984*

The installation does not have any petroleum storage vessels as defined in these subparts that are subject to this regulation.

- 6) 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.*

This subpart is not applicable to any tanks on site. All tanks on site fall below the applicability threshold of 19,812.90 gallons. (The tanks EP-08 and EP-09 have storage capacities of 1,000 gallons and 550 gallons, respectively).

- 7) 40 CFR 60 Subpart JJJJ, *Standards of Performance for Spark Ignition Internal Combustion Engines.* This subpart does not apply because the spark ignition internal combustion engines were installed in 1969 prior to the applicability date of June 12, 2006.

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

- 1) 40 CFR Part 63, Subpart Q, *National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers*

The provisions of this subpart apply to all new and existing industrial process cooling towers that are operated with chromium-based water treatment chemicals and are either major sources or are integral parts of facilities that are major sources as defined in 40 CFR 63.401.

The installation is not a major source of HAPs nor the cooling towers located at this installation use chromium-based water treatment chemicals; therefore, this rule does not apply.

- 2) 40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*  
The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride or chloroform, or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. Wipe cleaning activities, such as using a rag containing halogenated solvent or a spray cleaner containing halogenated solvent are not covered under the provisions of this subpart.

The maintenance cold cleaner unit does not use halogenated solvents as identified in 40 CFR 63.460(a); therefore, the parts washer is not subject to the MACT standards for halogenated solvent cleaning.

- 3) 40 CFR Part 63, Subpart ZZZZ, *National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*  
The installation operates eight (8) spark ignition, 4 stroke, rich burn internal combustion engines (SI ICE) fired by natural gas. The ICEs are subject to Subpart ZZZZ.
- 4) 40 CFR Part 63 Subpart DDDDD, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*  
This Subpart applies to a facility that owns or operates industrial boilers, institutional boilers, commercial boilers, and process heaters that is located at a major source, or is part of, a major source of HAP emissions. A process heater is defined as a unit in which the combustion gases do not directly come into contact with process material or gases in the combustion chamber (e.g., indirect fired). A boiler is defined as an enclosed device using controlled flame combustion and having the primary purpose of recovering thermal energy in the form of steam or hot water.

This regulation does not apply to the boilers (EP-03) at this facility because the installation is an area source of hazardous air pollutants (HAPs).

- 5) 40 CFR Part 63 Subpart JJJJJ, *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*  
This regulation applies to boilers at area source facilities that burn coal, oil, biomass, or non-waste materials. Boilers burning gaseous fuels as defined in this regulation would not be affected by the rule.

This regulation does not apply to the boilers (EP-03) because these boilers are natural gas fired units. The rule exempts boilers fired with these types of fuels. According to this rule, gas-fired boiler includes any boiler that burns gaseous fuels not combined with any solid fuels, burns liquid fuel only

during periods of gas curtailment, gas supply interruption, startups, or periodic testing, maintenance, or operator training on liquid fuel.

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

10 CSR 10-6.080, *Emission Standards for Hazardous Air Pollutants*

40 CFR Part 61 Subpart M – *National Emission Standard for Asbestos*.

The installation is not subject to any NESHAP standard with the exception of Subpart M - National Emission Standard for Asbestos. The installation is potentially subject to Subpart M. If the installation conducts any demolition or renovation projects to a building(s) containing asbestos, they must determine applicability with the following NESHAP regulations:

- Demolition and Renovation - 40 CFR 61.145
- Waste Disposal for Manufacturing, Fabricating, Demolition, Renovation, and Spraying Operations - 40 CFR 61.150

### **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. The only emission units subject to a standard that require control equipment to meet the limits in the standard are the six engines (EP-01). However, the pre-control potential to emit the specific regulated pollutant from these engines is below the major source thresholds. Additionally, these units are subject to 40 CFR Part 63, Subpart ZZZZ standards and units that are subject to 111 or 112 standards promulgated after 11/15/90 are excluded from CAM.

### **Greenhouse Gas Emissions**

Potential emissions of greenhouse gases (CO<sub>2</sub> equivalent (CO<sub>2</sub>e)) for this installation are estimated to be 38,661.97 tons, classifying the installation as a minor source of GHGs. There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO<sub>2</sub>e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO<sub>2</sub>e emissions were not included within this permit.



**Other Regulatory Determinations**

- 1) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants* is applicable to the installation, but has not been applied within this permit. Applicability of this regulation to the installation’s visible emissions sources is discussed in the following table:

Emission Unit	Description	10 CSR 10-6.220 Applicability
EP-01	(6) Internal Combustion Engines (Enginators)	10 CSR 10-6.220(1)(A) exempts stationary internal combustion engines operated in the St. Louis metropolitan area.
EP-02	(2) Internal Combustion Engines (North and South Centrifugal Engines)	
EP-10	Emergency Air Compressor (Gasoline)	
EP-03	North and South Boilers	These sources are potentially subject to this regulation. Particulate emissions were calculated to be less 0.5 lbs/hr from each source; therefore, the emission units are assumed to be in compliance with this regulation without any monitoring.
EP-11	North and South Evaporative Cooling Towers	
EP-11	CWT-1 Cooling Tower	The CWT-1 Cooling Tower is a fugitive source that does not emit regulated pollutants from a discrete stack or vent. This source emits particulate matter directly into the ambient air. This source does not have any type of capture/control devices and is not covered or required to control the emissions based on any past or current regulations. This source is not subject to any specific rule except the core permit requirement of 10 CSR 10-6.170 and must comply with this requirement.

- 2) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*  
 10 CSR 10.6.261, *Control of Sulfur Dioxide Emissions*.

These rules are not applicable to the installation. The boilers (EP-03) and internal combustion engines (EP-01 and EP-02) combust only natural gas. Thus, they are exempt from regulation 10 CSR 10-6.260(1)(A)2. and regulation 10 CSR 10-6.261(1)(A). There is also a small emergency air compressor (EP-10) that operates on gasoline; but, the sulfur content of gasoline is so low (0.03% - 0.04% by weight per AP-42 Vol. 1, Appendix A) that the sulfur compound emissions are expected to be negligible. As such, this compressor is being listed as an emission unit without limitation.

- 3) 10 CSR 10-6.405, *Restriction of Particulate Matter Emissions Fuel Burning Equipment Used for Indirect Heating*

The installation operates two boilers (EP-03), both constructed in 1969:

- North Boiler (BLR-N), 8.53 MMBtu/hr, fuel type: natural gas
- South Boiler (BLR-S), 8.53 MMBtu/hr, fuel type: natural gas

In the operating permit application, the permittee indicated that these boilers are subject to 10 CSR 10-6.405. However, the boilers meet the criteria defined in 10 CSR 10-6.405(C) and therefore are exempt from demonstrating compliance with this rule. As such, the boilers are being listed as emission units without limitation.

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

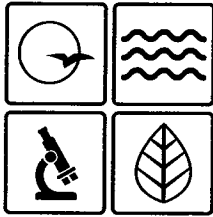
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:

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 P70 Operating Permit for Brandonview LLC – Gallery 720 Building was placed on public notice as of May 5, 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> on Friday, May 5, 2017. The Air Pollution Control Program did not receive any comments from either the public or the applicant during the 30-day comment period.



Missouri Department of

dnr.mo.gov

# NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

SEP 25 2017

Mr. Brian P. Hayden  
Brandonview LLC - Gallery 720 Building  
720 Olive Street, Suite 120  
St. Louis, MO 63101

Re: Part 70 Operating Permit  
Installation No: 510-2378, Permit Number: OP2017-073

Dear Mr. Hayden:

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 do not hesitate to contact Berhanu Getahun at the St. Louis Regional Office, 7545 S. Lindbergh, Suite 210, St. Louis, MO 63125, or by telephone at (314) 416-2960. You may also contact me with the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:bjj

Enclosures

c: PAMS File: 2016-03-056



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