



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: OP2011-059
Expiration Date: NOV 30 2016
Installation ID: 077-0004
Project Number: 2010-06-060

Installation Name and Address

Carlisle Transportation Products, Inc.
2601 W. Battlefield
Springfield, MO 65807
Greene County

Parent Company's Name and Address

Carlisle Companies, Inc.
Suite 400
13925 Ballantyne Corporate Place, Suite 400
Charlotte, NC 28277

Installation Description:

Carlisle Transportation Products, Inc. is a rubber processing and rubber products manufacturing installation located in Springfield, Missouri. Rubber products produced include power transmission belts, automotive belts, and a variety of industrial belts. Rubber processing at the installation includes cutting, grinding, mixing, and coating operations. The installation is a major source of Nitrogen Oxides (NO_x), Particulate Matter \leq Ten Microns (PM₁₀), Sulfur Oxides (SO_x), and Volatile Organic Compounds (VOCs). The installation is a synthetic minor source of Hazardous Air Pollutants (HAPs) and Toluene (108-88-3).

DEC 01 2011

Effective Date

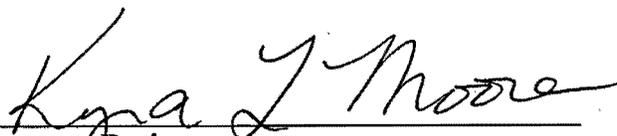

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Carlisle Transportation Products, Inc. is a rubber processing and rubber products manufacturing installation located in Springfield, Missouri. Rubber products include power transmission belts, automotive belts, and a variety of industrial belts. Rubber is mixed in Banbury mixers and formed into sheets. The cord is treated with toluene, coated with adhesive and then dried in ovens. Belts are constructed by layering rubber, fabric, and cord around a drum with a diameter equivalent to that desired in the final belt. The drum is then placed within a steam-heated pressure vessel to vulcanize the rubber. The belt is then removed from the drum, cut, shaped, and grooved according to specifications for the desired final belt. The installation is a major source of Nitrogen Oxides (NO_x), Particulate Matter ≤ Ten Microns (PM₁₀), Sulfur Oxides (SO_x), and Volatile Organic Compounds (VOCs). The installation is a synthetic minor source of Hazardous Air Pollutants (HAPs) and Toluene (108-88-3).

Reported Air Pollutant Emissions, tons per year					
Pollutant	2010	2009	2008	2007	2006
Particulate Matter ≤ Ten Microns (PM ₁₀)	3.66	3.38	8.11	9.36	11.10
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	1.07	1.41	4.46	4.78	6.19
Sulfur Oxides (SO _x)	4.71	5.84	79.89	80.91	95.68
Nitrogen Oxides (NO _x)	11.30	10.49	30.31	30.21	29.50
Volatile Organic Compounds (VOC)	73.90	62.77	110.72	105.21	116.49
Carbon Monoxide (CO)	8.41	7.43	5.97	5.61	5.02
Lead (Pb)	0.005	0.004	0.01	0.01	0.01
Ammonia (NH ₃)	0.34	0.30	0.52	0.51	0.53
Hazardous Air Pollutants (HAPs)	8.91	7.37	3.07	2.56	8.69
Toluene (108-88-3)	5.82	3.71	0.40	0.01	4.03
Carbon Disulfide (75-15-0)	-	1.51	0.62	0.45	2.25
Methylene(B)4-phenylisocyanate (101-68-8)	1.00	0.60	0.70	0.54	0.50
Methanol (67-56-1)	0.89	0.57	0.59	0.65	0.65
Styrene (100-42-5)	0.60	0.38	0.40	0.49	0.49
Formaldehyde (50-00-0)	0.21	0.14	0.14	0.11	0.11
Carbonyl Sulfide (463-58-1)	-	0.17	0.02	0.06	0.26
Methyl Isobutyl Ketone (108-10-1)	0.07	0.03	0.08	0.02	0.08
Acetophenone (98-86-2)	0.07	0.03	0.002	0.004	0.02
N-Hexane (110-54-3)	0.06	0.04	0.01	0.02	0.05
Xylene (1330-20-7)	0.05	0.03	0.01	0.01	0.02
Dichloromethane (75-09-2)	-	0.04	0.04	0.03	0.04
Dimethyl Formamide (68-12-2)	-	-	-	-	0.04
Perchloroethylene (127-18-4)	0.03	0.03	0.004	0.04	0.02
1,1,1-Trichloroethane (71-55-6)	0.03	0.01	0.0002	0.001	0.001
2,2,4-Trimethylpentane (540-84-1)	0.01	0.01	0.002	0.003	0.01
1,3-Butadiene (106-99-0)	0.01	0.01	0.01	0.01	0.01
Phenol (108-95-2)	0.01	0.004	0.001	0.004	0.01
Chloroprene (126-99-8)	-	0.01	0.01	0.03	0.02

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	Emission Unit	Description
7	Babcox & Wilcox Boiler	20	Mill Mixing
8	Norton & Timesaver Grinders	28	Polyrib Pirona Grinder
9	Keeler Boiler	29	Raw Edge V-Band Stone Grinder
10	Cleaver Brooks Boiler	33	SM Form Grinder
11	Banbury Mixing	37	Neoprene Hopper Vent
13A	3C Cord Machine - Process Emissions	39	Emergency Generator
13B	3C Cord Machine - Combustion Emissions	40	Railcar Unloading Carbon Black
		41	Single Belt Grinders

EMISSION UNITS WITHOUT LIMITATIONS

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

Emission Unit	Description
19	3C Cord Machine - Toluene Solvent Losses
21	Spreader Doctor Knife
22	Spreader Oven Operation
23	Dip Tank Fabric Spreader
24	Oven-Fabric Spreader
25, 26, and 27	(2) Vertical Sag, (2) Vertical Profilers, Skiver, Grinder
30	Small Raw Edge Spray Booth
31	Small Raw Edge Spray Booth
32	Small Raw Edge Spray Booth
35	R&D Banbury Mix, Mill Mix and Compounding
36	Plant Fugitives (excluding 3C Cord Machine)
38	Pre-Compound
6-F	300,000 gallon Fuel Oil #6 Fixed Roof North Storage Tank
7-F	285,000 gallon Fuel Oil #6 Fixed Roof South Storage Tank
T-1	10,000 gallon Toluene Fixed Roof Storage Tank
T-2	270 gallon Ethyl Acetate Totes
T-3	270 gallon Heptane Totes
T-5	(3) 500 gallon Diesel Storage Tanks
IEP-01	(3) 10,000 gallon Refined Oil Storage Tanks
IEP-02	Rebrand Area
IEP-03	Fabric Drying, Hot Rooms, Belt Branding, Creel Room, Belt Humidor Units
IEP-06	Chem Lab Test Area
	Propane Filling Station
	Water Based Coatings Spray Booths
	(2) Grit Blasters

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.

PERMIT CONDITION PW001

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

1. The permittee shall emit less than ten tons of any individual HAPs from the entire installation in any consecutive 12-month period.
2. The permittee shall emit less than 25 tons combined of HAPs from the entire installation in any consecutive 12-month period.

Monitoring/Recordkeeping:

1. The permittee shall maintain usage records for each HAP producing emission unit.
2. The permittee shall calculate the monthly and rolling 12-month HAP emissions for each individual HAP and for total combined HAP using Attachments E, F, G, H, and I or equivalent forms generated by the permittee.
3. The permittee shall maintain a complete set of Material Safety Data Sheets (MSDS) for all HAP containing material used at the installation.
4. Records may be kept in either written or electronic form.
5. All records shall be maintained for five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. If at any time the emission limits of ten tons individual HAP or 25 tons combined HAPs should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and the Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after the exceedance.
2. The permittee shall report any deviations from the emission limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001					
10 CSR 10-6.405 Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating					
Springfield City Code Article III, Section 2A-15					
Emission Unit	Description	Construction Date	MHDR (MMBtu/hr)	Fuels	Stack #
7	Babcox & Wilcox Boiler	1957	20.4	Natural Gas	7
9	Keeler Boiler	1969	45.2	Natural Gas, Residual Oil #6, and/or Waste Oil	9
10	Clever Brooks Boiler	1979	34	Natural Gas, Residual Oil #6, and/or Waste Oil	10
13B	3C Cord Machine – Combustion Emissions	1969	1.5	Natural Gas	13

Emission Limitation:

1. Springfield City Code: The permittee shall not emit particulate matter in excess of 0.35 lb/MMBtu of heat input from existing indirect heating sources 7 Babcox & Wilcox Boiler, 9 Keeler Boiler, and 13B 3C Cord Machine – Combustion Emissions.
2. The permittee shall not emit particulate matter in excess of 0.28 lb/MMBtu of heat input from new indirect heating source 10 Cleaver Brooks Boiler.

Operational Limitation:

1. The permittee shall calibrate, maintain and operate the emission units according to the manufacturer’s specifications and recommendations.
2. The permittee shall not combust waste oil containing an ash content greater than 1.02 weight percent within existing indirect heating source 9 Keeler Boiler.
3. The permittee shall not combust waste oil containing an ash content greater than 0.82 weight percent within new indirect heating source 10 Cleaver Brooks Boiler.
4. The permittee shall not combust residual oil containing a sulfur content greater than 6.2 weight percent within existing indirect heating source 9 Keeler Boiler.
5. The permittee shall not combust residual oil containing a sulfur content greater than 4.89 weight percent within new indirect heating source 10 Cleaver Brooks Boiler.

Fuel Testing:

1. Fuel testing on the waste oil combusted within 9 Keeler Boiler and 10 Cleaver Brooks Boiler shall be performed once every five years to determine the ash content of the waste oil.

- a) If the waste oil testing demonstrates that either emission unit is not in compliance with their respective ash content limits, then the installation shall submit a compliance plan for approval by the Director within 30 days of the testing demonstrating their planned actions to become compliant.

Monitoring/Recordkeeping:

1. Attachment A contains calculations which demonstrate that these emission units will never exceed the emission limitation while combusting natural gas and being properly operated and maintained.
2. The permittee shall maintain a maintenance log noting all inspections, malfunctions, and repairs of the emission units using Attachment B or an equivalent form generated by the permittee.
3. The permittee shall retain records of all fuel testing performed.
4. The permittee shall retain residual oil purchase records to document compliance with the sulfur content restrictions on 9 Keeler Boiler and 10 Cleaver Brooks Boiler.
5. Records may be kept in either written or electronic form.
6. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
7. All records shall be retained for at least five years after the date of occurrence.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 and the Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations, operational limitations, fuel testing, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 002	
10 CSR 10-6.060 Construction Permits Required Construction Permit 1199-206D, Issued November 30, 1999	
Emission Unit	Description
11	Banbury Mixing

Operational Limitation:

Special Condition 7.1: The permittee shall not produce finish batch rubber in excess of 5.778 ton/hr based upon a daily (24 hour) average.

Monitoring/Recordkeeping:

1. Special Condition 7.2: The permittee shall record the daily amount of finish batch rubber produced by this emission unit.
2. The permittee shall determine the hourly production rate of emission unit 11 Banbury Mixing using Attachment C or an equivalent form generated by the permittee.
3. Records may be kept in either written or electronic form.
4. All records shall be made available immediately to any Missouri Department of Natural Resources' personnel upon request.
5. Special Condition 7.3: The permittee shall maintain all records for a minimum of five years.

Reporting:

1. If at any time the production limit of 5.778 ton/hr should be exceeded, the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and the Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after the exceedance.
2. The permittee shall report any deviations from the operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 003

10 CSR 10-6.060 Construction Permits Required

Construction Permit 1103-238D, Issued November 24, 2003, Amended July 6, 2004

Emission Unit	Description
41	Single Belt Grinders

Emission Limitation:

Special Condition 1: The permittee shall not discharge into the atmosphere from emission unit 41 Single Belt Grinders any PM₁₀ in excess of 15 tons in any consecutive 12-month period.

Monitoring/Recordkeeping:

1. Special Condition 2: The permittee shall record the monthly usage of emission unit 41 Single Belt Grinder. The permittee shall use Attachment D or an equivalent form generated by the permittee to calculate their monthly and 12-month rolling PM₁₀ emissions.
2. Records may be kept in either written or electronic form.
3. Special Condition 3: The permittee shall maintain all records onsite for the most recent five years. All records shall be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. If at any time the annual emission limit of 15 tons PM₁₀ should be exceeded or a malfunction occur which could possibly cause an exceedance, the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and the Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after the exceedance.
2. The permittee shall report any deviations from the emission limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 004

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants – Existing Sources
Springfield City Code Article III, Sections 2A-9 and 2A-10

Emission Unit	Description
8	Norton & Timesaver Grinders
9	Keeler Boiler
10	Cleaver Brooks Boilers
13A	3C Cord Machine – Process Emissions
20	Mill Mixing
28	Polyrib Pirona Grinder
29	Raw Edge V-Band Stone Grinder
33	SM Form Grinder
37	Neoprene Hopper Vent
40	Railcar Unloading Carbon Black

Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 40 percent.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60 percent.
3. Springfield City Code:
 - a) The permittee shall not discharge or permit the discharge of, into the outdoor atmosphere, from any single existing source of emission whatsoever, any air contaminant:
 - i) Of a shade or density equal to or darker than that designated as #2 on the Ringelmann smoke chart; or
 - ii) Of such opacity as to obscure an observer’s view to a degree equal to or greater than does smoke of a shade or density equal to or darker than that designated as #2 on the Ringelmann smoke chart.
 - b) Exception: It shall not be unlawful to discharge into the outdoor atmosphere from any single source of emission:
 - i) Air contaminants of a shade, density or opacity equal to but not darker than that designated as #2 on the Ringelmann chart so long as the emission shall not exist for a period aggregating more than six minutes in any consecutive 60-minute period;
 - ii) Air contaminants of a shade, density or opacity equal to but not darker than that designated as #3 on the Ringelmann chart so long as the emission shall not exist for a period aggregating more than six minutes in any consecutive 60-minute period and the emission is caused by the starting of or cleaning of a fire, and so long as such emissions do not occur on more than three occasions during any consecutive 24-hour period;
 - iii) Air contaminants which fail to meet the requirements only because of the presence therein of uncombined water; or
 - iv) Air contaminants resulting from an unavoidable breakdown or malfunction of equipment;
 - v) Air contaminants resulting from a charcoal or similar fire being used for recreational purposes or being used for noncommercial preparation of food.

Monitoring:

1. The permittee shall conduct opacity readings on every emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee may complete their Method 22 opacity readings on all of the emission units at once, provided that all of the emission units subject to this regulation can be seen from that observation location. Readings are only required when an emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions, the source representative shall conduct a Method 9 observation.
2. The following monitoring schedule shall be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
 - b) Observations shall be made once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations shall be made once per month. If a violation is noted, monitoring reverts to weekly.
 - d) If at the time of this operating permit's issuance the permittee has already progressed to conducting observations once every two weeks or one per month, the permittee may continue from that point forward in the monitoring schedule; however, if a violation is noted the permittee shall revert back to weekly monitoring.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1. The permittee shall maintain records of all observation results (see Attachments K & L, or equivalent forms generated by the permittee), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units and
 - b) All emission units from which visible emissions occurred.
2. The permittee shall maintain records of all maintenance and any equipment malfunctions using Attachment B or an equivalent form generated by the permittee.
3. The permittee shall maintain records of any EPA Method 9 opacity test performed in accordance with this permit condition.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. Records may be kept in either written or electronic form.
6. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and the Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 005

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants – New Sources
Springfield City Code Article III, Sections 2A-9.5 and 2A-10

Emission Unit	Description
11	Banbury Mixing
41	Single Belt Grinders

Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20 percent.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 60 percent.
3. Springfield City Code:
 - a) The permittee shall not discharge or permit the discharge of, into the outdoor atmosphere, from any single new source of emission whatsoever, any air contaminant:
 - i) Of a shade or density equal to or darker than that designated as #1 on the Ringelmann smoke chart; or
 - ii) Of such opacity as to obscure an observer’s view to a degree equal to or greater than does smoke of a shade or density equal to or darker than that designated as #1 on the Ringelmann smoke chart.
 - b) Exception: It shall not be unlawful to discharge into the outdoor atmosphere from any single source of emission:
 - i) Air contaminants of a shade, density or opacity equal to but not darker than that designated as #2 on the Ringelmann chart so long as the emission shall not exist for a period aggregating more than six minutes in any consecutive 60-minute period;
 - ii) Air contaminants of a shade, density or opacity equal to but not darker than that designated as #3 on the Ringelmann chart so long as the emission shall not exist for a period aggregating more than six minutes in any consecutive 60-minute period and the emission is caused by the starting of or cleaning of a fire, and so long as such emissions do not occur on more than three occasions during any consecutive 24-hour period;
 - iii) Air contaminants which fail to meet the requirements only because of the presence therein of uncombined water;
 - iv) Air contaminants resulting from an unavoidable breakdown or malfunction of equipment; or
 - v) Air contaminants resulting from a charcoal or similar fire being used for recreational purposes or being used for noncommercial preparation of food.

Monitoring:

1. The permittee shall conduct opacity readings on every emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee may complete their Method 22 opacity readings on all of the emission units at once, provided that all of the emission units subject to this regulation can be seen from that observation location. Readings are only required when an emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions, the source representative shall conduct a Method 9 observation.
2. The following monitoring schedule shall be maintained:

- a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
 - b) Observations shall be conducted once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations shall be conducted once per month. If a violation is noted, monitoring reverts to weekly.
 - d) If at the time of this operating permit issuance the permittee has already progressed to conducting observations once every two weeks or once per month, the permittee may continue from that point forward in the monitoring schedule; however, if a violation is noted the permittee shall revert back to weekly monitoring.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

1. The permittee shall maintain records of all observation results (see Attachments K & L, or equivalent forms generated by the permittee), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units and
 - b) All emission units from which visible emissions occurred.
2. The permittee shall maintain records of all maintenance and any equipment malfunctions using Attachment B or an equivalent form generated by the permittee.
3. The permittee shall maintain records of any EPA Method 9 opacity test performed in accordance with this permit condition.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. Records may be kept in either written or electronic form.
6. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and the Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 006

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds – Indirect Heating Sources

Emission Unit	Description
9	Keeler Boiler ¹
10	Cleaver Brooks Boiler ¹

¹This regulation is only applicable to this boiler when the boiler is combusting fuel oil and/or waste oil. The boiler is exempt while combusting natural gas per 10 CSR 10-6.260(1)(A)2.

Emission Limitation:

- The permittee shall not cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three hour time period.
- The permittee shall not cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 *Ambient Air Quality Standards*:

Pollutant	Concentration by Volume	Remarks ¹
Sulfur Dioxide (SO ₂)	0.5 ppm (1300 µg/m ³)	3-hour average not to be exceeded more than once per year
	75 ppb	1-hour average; 3-year average of the 99 th percentile of the daily maximum 1-hour average at each site monitor within an area
Hydrogen Sulfide (H ₂ S)	0.05 ppm (70 µg/m ³)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 µg/m ³)	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H ₂ SO ₄)	10 µg/m ³	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 µg/m ³	1-hour average not to be exceeded more than once in any 2 consecutive days

¹This requirement is not federally enforceable.

Monitoring/Recordkeeping

- The permittee shall retain the potential to emit calculations in Attachment M which demonstrate that the above emission limitation will never be exceeded.
- The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- All records shall be maintained for five years.

Reporting:

- The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and the Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
- The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 007	
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds	
Emission Unit	Description
39	Emergency Generator

Emission Limitations:

1. The permittee shall not cause or permit the emission into the atmosphere gases containing more than 2,000 ppmv of sulfur dioxide or more than 70 mg/m³ of sulfuric acid or sulfur trioxide or any combination of these gases averaged on any consecutive three-hour time period.
2. The permittee shall not cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 *Ambient Air Quality Standards*:

Pollutant	Concentration by Volume	Remarks ¹
Sulfur Dioxide (SO ₂)	0.5 ppm (1300 µg/m ³)	3-hour average not to be exceeded more than once per year
	75 ppb	1-hour average; 3-year average of the 99 th percentile of the daily maximum 1-hour average at each site monitor within an area
Hydrogen Sulfide (H ₂ S)	0.05 ppm (70 µg/m ³)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 µg/m ³)	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H ₂ SO ₄)	10 µg/m ³	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 µg/m ³	1-hour average not to be exceeded more than once in any 2 consecutive days

¹This requirement is not federally enforceable.

Monitoring/Recordkeeping:

1. The permittee shall maintain an accurate record of the sulfur content of fuel as fired.
2. The permittee shall monitor the sulfur content of each delivery of fuel (fuel oil #2/diesel) documenting that the sulfur content never exceeds 0.2 percent. (Fuel sulfur content at or below 0.2 percent, i.e. 2,000 ppm, demonstrates compliance.)
3. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
4. Records may be kept in either written or electronic form.
5. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and the Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 008	
10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes Springfield City Code Article III, Sections 2A-20 and 2A-23	
Emission Unit	Description
8	Norton & Timesaver Grinders
11	Banbury Mixing
13A	3C Cord Machine – Process Emissions
20	Mill Mixing
37	Neoprene Hopper Vent
40	Railcar Unloading Carbon Black

Emission Limitations:

1. The permittee shall not emit particulate matter in excess of the limits given in the following table:

Emission Unit	Description	PM Emission Limit (lb/hr)
8	Norton & Timesaver Grinders	4.93
11	Banbury Mixing	13.28
13A	3C Cord Machine – Process Emissions	3.04
20	Mill Mixing	3.74
37	Neoprene Hopper Vent	6.52
40	Railcar Unloading Carbon Black	19.71

2. The permittee shall not cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Monitoring/Recordkeeping:

1. The permittee shall retain the potential to emit calculations in Attachment N which demonstrate that the above emission limitation will never be exceeded. No further recordkeeping shall be required to demonstrate compliance with the emission limitations.
2. The calculations shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and the Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 009		
10 CSR 10-6.400 Restriction of Emission of Particulate Matter From Industrial Processes Springfield City Code Article III, Sections 2A-20 and 2A-23		
Emission Unit	Description	Control Device
28	Polyrib Pirona Grinder	CD-28 Cyclone
29	Raw Edge V-Band Stone Grinder	CD-29 Cyclone
33	SM Form Grinder	CD-33 Cyclone
41	Single Belt Grinders	CD-41A Cyclone

Emission Limitations:

1. The permittee shall not emit particulate matter in excess of the limits given in the following table:

Emission Unit	Description	PM Emission Limit (lb/hr)
28	Polyrib Pirona Grinder	1.75
29	Raw Edge V-Band Stone Grinder	1.75
33	SM Form Grinder	1.30
41	Single Belt Grinders	0.97

2. The permittee shall not cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Operational Limitations:

1. The permittee shall control emissions from 28 Polyrib Pirona Grinder, 29 Raw Edge V-Band Stone Grinder, 33 SM Form Grinder, and 41 Single Belt Grinders using cyclones. The cyclones shall be operated and maintained in accordance with manufacturer’s specifications. The cyclones shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources’ employees may easily observe them.
2. The cyclones shall be operated such that the pressure drop across the control device is within 8” to 10” of water column.

Monitoring/Recordkeeping:

1. The permittee shall monitor and record the operating pressure drop across the cyclones at least once each operating day while the unit is operating. The operating pressure drop ranges will be specified based on normal operation and manufacturer’s recommendations.
2. The permittee shall maintain an operating and maintenance log for each control device using Attachment B or an equivalent form generated by the permittee. The record shall be maintained in hard copy or electronic form. The log(s) shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
3. These records shall be made available immediately for inspection to the Department of Natural Resources’ personnel upon request.
4. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and the Air Pollution Control Authority,

227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.

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

PERMIT CONDITION 010

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
 40 CFR Part 63, Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Emission Unit	Description	Size
39	Emergency Generator ¹	345 HP

¹An existing emergency stationary CI RICE located at an area source of HAP emissions shall comply with the applicable emission limitations and operating limitations no later than May 3, 2013. [§63.6595(a)(1)]

Emergency stationary RICE means any stationary internal combustion engine whose operation is limited to emergency situations and required testing and maintenance. Examples include stationary ICE used to produce power for critical networks or equipment (including power supplied to portions of a facility) when electric power from the local utility (or the normal power source, if the facility runs on its own power production) is interrupted, or stationary ICE used to pump water in the case of fire or flood, etc. Stationary CI ICE used for peak shaving are not considered emergency stationary ICE. Stationary CI ICE used to supply power to an electric grid or that supply non-emergency power as part of a financial arrangement with another entity are not considered to be emergency engines. Required testing of such units should be minimized, but there is no time limit on the use of emergency stationary RICE in emergency situations and for routine testing and maintenance. [§63.6675]

Emission Limitations:

None.

Operational Limitations:

1. At all times the permittee shall operate and maintain the affected engine in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used shall be based on information available including review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the engine. [§63.6605(b)]
2. The permittee shall meet the following requirements (except during periods of engine startup): [§63.6603(a)]
 - a) Change the engine oil and oil filter every 500 hours of operation or annually, whichever comes first;
 - b) Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first;
 - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
3. The Permittee shall only operate the engine within the following hour limitations: [§63.6640(f)]
 - a) Unlimited use in emergency situations. [§63.6603(f)(2)]
 - b) 50 hours per year for any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations. [§63.6640(f)(1)]

- c) 100 hours per year for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. The 50 hours allowed in 3.b) above count towards this 100 hour limitation. [§63.6640(f)(3) and §63.6603(f)(4)]
4. If the engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required above, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. [§63.6603(a)]
5. During periods of startup the permittee shall minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [§63.6625(h)]
6. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirements in 2.a), 2.b) and 2.c) of this condition. The oil analysis shall be performed at every 500 hours of operation or annually. The analysis program shall at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base 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 permittee is not required to change the oil. If any of the limits are exceeded, the permittee shall change the oil before continuing to use the engine. The permittee shall 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 shall be part of the maintenance plan for the engine. [§63.6603(i)]
7. The permittee shall install a non-resettable hour meter on this engine if one is not already installed. [§63.6625(f)]

Recordkeeping:

1. The permittee shall keep the following records for this engine: [§63.6655(a)]
 - a) Records of the occurrence and duration of each malfunction of process equipment or any air pollution control and monitoring equipment and actions taken during periods of malfunction to minimize emissions including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(2) and §63.6655(a)(5)]
 - b) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
 - c) Records that the engine was operated and maintained according to the manufacturer's emission-related operation and maintenance instructions or that a maintenance plan has been developed to provide for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6655(e)]
 - d) Records of the hours of operation for the engine as measured by the non-resettable hour meter. The installation shall also maintain a recordkeeping form indicating out of the total hours measured by the meter: [§63.6655(f)]
 - i) How many hours were spent in emergency use and a brief description of the emergency situation.

- ii) How many hours were spent in non-emergency operation.
- e) These records shall be made available for inspection upon request by Missouri Department of Natural Resources' personnel. [§63.6660(a)]
- f) All records shall be maintained for five years. [§63.6660(b)]
- g) Records shall be kept readily accessible in hard copy or electronic form. [§63.6660(c)]

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, and the Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report to the Missouri Department of Natural Resources' failure to perform the work practice on the schedule required under "Operational Limitations #2" due to Federal, State or local law under which the risk was deemed unacceptable. This report should be submitted with the semi-annual reporting required in #3 of this section. [§63.6650(f)]
3. The permittee shall report any deviations from the operational limitations, recordkeeping and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit. These reports shall also include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period. The report shall also include a description of actions taken by the permittee during malfunction to minimize emissions, including actions taken to correct a malfunction. If there are no deviations from any operating limitations that apply, a statement that there were no deviations from the operating limitations during the reporting period shall be included.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements and Springfield City Code Article IV, Section 2A-28
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- 1) General Provisions. The open burning of refuse, tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) No person shall cause, permit, or allow a salvage operation to be conducted in whole or in part by open burning.
- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the permittee fails to comply with the conditions or any provisions of the permit.
- 4) Carlisle Transportation Products, Inc. may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least 200 yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Carlisle Transportation Products, Inc. fails to comply with the provisions or any condition of the open burning permit.
 - a) In a nonattainment area, as defined in 10 CSR 10-6.020, Paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

Springfield City Code Article IX, Section 2A-46 - Breakdown of Equipment

This requirement is not federally or state enforceable.

In the event that emissions as a direct result of upset conditions or breakdown exceed any of the established limits, the permittee shall advise the city of Springfield Director of Health of such a breakdown and outline a corrective program acceptable to the Director.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the Paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the Paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

Springfield City Code Article II, Section 2A-6 - Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

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

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

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

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full paper EIQ to the Air Pollution Control Program by no later than April 1st after the end of each reporting year. The permittee may instead submit a full electronic EIQ via MoEIS by no later than May 1st after the end of each reporting year.
- 5) Emission fees are due by no later than June 1st after the end of each reporting year. The fees shall be payable to the Missouri Department of Natural Resources.
- 6) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the 12-month period immediately preceding the end of the reporting period.
- 7) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention and Springfield City Code Article X, Section 2A-47

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 10-6.170

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

Emission Limitation:

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

Monitoring:

- 1) The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.
 - a) The permittee shall maintain the following monitoring schedule:
 - b) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance.
 - c) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once every two weeks for a period of eight weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.
 - (2) If a violation is noted, monitoring reverts to weekly.
 - d) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall document all readings on Attachment J, or its equivalent, noting the following:

- a) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- b) Whether equipment malfunctions contributed to an exceedance.
- c) Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-6.165 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.

Springfield City Code Article VI, Sections 2A-39 and 2A-40

This requirement is not federally enforceable.

- 1) No person shall emit odorous matter such as to cause an objectionable odor on or adjacent to:
 - a) Residential, recreational, institutional, retail sales, hotel or educational premises.
 - b) Industrial premises when air containing such odorous matter is diluted with 20 or more volumes of odor-free air; or
 - c) Premises other than those in 1 and 2 above when air containing odorous matter is diluted with four or more volumes of odor-free air.
- 2) The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30 percent or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size is to be at least 20 people or 75 percent of those exposed if fewer than 20 people are exposed.

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to

allow the Department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the Department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the Department. Certain business entities that meet the requirements for state-approved exemption status must allow the Department to monitor training classes provided to employees who perform asbestos abatement.

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

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

10 CSR 10-6.280 Compliance Monitoring Usage
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- | |
|--|
| <p>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:</p> <ul style="list-style-type: none">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; andc) Any other monitoring methods approved by the Director. <p>2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:</p> <ul style="list-style-type: none">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; andc) Compliance test methods specified in the rule cited as the authority for the emission limitations. <p>3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:</p> <ul style="list-style-type: none">a) Applicable monitoring or testing methods, cited in:<ul style="list-style-type: none">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"; orb) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above. |
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V. General Permit Requirements

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

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

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

10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements

- 1) Recordkeeping
 - 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's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi-annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit; this includes deviations or Part 64 exceedances.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - 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 semi-annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

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

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

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

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

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

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

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

the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

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

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

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

None.

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program's 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 application 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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, 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), recordkeeping, 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's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, 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 Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program 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 Air Pollution Control Program as soon as possible after learning of the need to make the change.
 - b) The permit shield shall not apply to these changes.

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. 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)12 Responsible Official

The application utilized in the preparation of this permit was signed by Mr. Gary Richards, Plant Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources receives notice from the 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) The Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 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) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

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

VI. Attachments

Attachments follow.

Attachment A

10 CSR 10-6.405 and Springfield Article III, Section 2A-15 Compliance Demonstration

This attachment may be used to demonstrate that the listed emission units are in compliance with 10 CSR 10-6.405 *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating* and Springfield City Code Article III, Section 2A-15. Installation's Total Heat Input (Q) in MMBtu/hr:

Emission Unit	Description	MHDR (MMBtu/hr)
7	Babcox & Wilcox Boiler	20.4
9	Keeler Boiler	45.2
10	Cleaver Brooks Boiler	34
13B	3C Cord Machine – Combustion Emissions	1.5
Total Q		101.1

Missouri's 10 CSR 10-6.405(3)(D): The maximum allowable PM emission limitation for existing indirect heating sources at an installation located in the Springfield-Greene County area having an intermediate total heat input capacity between 10 MMBtu and 10,000 MMBtu:

$$E = 0.90(Q)^{-0.174} = 0.90(101.1)^{-0.174} = 0.40 \text{ lb/MMBtu}$$

Missouri's 10 CSR 10-6.405(3)(E): The maximum allowable PM emission limitation for new indirect heating sources at an installation located in the Springfield-Greene County area having an intermediate total heat input capacity between 10 MMBtu and 2,000 MMBtu:

$$E = 1.31(Q)^{-0.338} = 1.31(101.1)^{-0.338} = 0.28 \text{ lb/MMBtu}$$

Springfield's §2A-15: The maximum allowable PM emission limitation for indirect heating sources at an installation having a capacity of ~ 100 MMBtu is 0.35 lb/MMBtu.

Emission Unit	Fuel	Emission Factor	Emission Factor (lb/MMBtu)	Emission Limit (lb/MMBtu)	
				Missouri	Springfield
7	Natural Gas	7.6 lb/MMscf	0.007	Not applicable ¹	
13B					
9	Natural Gas	7.6 lb/MMscf	0.007	0.40	0.35
	Residual Oil #6	52.44 lb/1000 gallons	0.35		
	Waste Oil	52.02 lb/1000 gallons	0.35		
10	Natural Gas	7.6 lb/MMscf	0.007	0.28	
	Residual Oil #6	41.92 lb/1000 gallons	0.28		
	Waste Oil	41.82 lb/1000 gallons	0.28		

¹ Exempt per 10 CSR10-6.405(1)(C) for exclusively combusting natural gas.

The emission factor for natural gas was taken from FIRE for SCC 10200602. The average heating value of 1,050 Btu/scf for natural gas was taken from AP-42 Appendix A. The calculations demonstrate that each emission unit has worst-case natural gas emissions far below the applicable emission limit; therefore, no further monitoring or recordkeeping is required while combusting natural gas.

Attachment A Continued

10 CSR 10-6.405 and Springfield Article III, Section 2A-15 Compliance Demonstration

AP-42 Table 1.3-5 provided an emission factor of 7.17A for residual oil #6 under SCC 10200402. Where $A = 1.12(S) + 0.37$. Where S = percent sulfur. The average heating value of 150,000 Btu/gallon for residual oil was taken from AP-42 Appendix A. **Emission unit 9 is in compliance with this regulation while burning residual oil that contains ≤ 6.2 percent sulfur. Emission unit 10 is in compliance with this regulation while burning residual oil that contains ≤ 4.89 percent sulfur.**

AP-42 Table 1.11-1 provided an emission factor of 51A for waste oil under SCC 10301302. Where A = percent ash. The average heating value of 150,000 Btu/gallon for waste oil mixed with residual oil was taken from AP-42 Section 1.11.3. **Emission unit 9 is in compliance with this regulation while burning waste oil that contains ≤ 1.02 percent ash. Emission Unit 10 is in compliance with this regulation while burning waste oil that contains ≤ 0.82 percent ash.**

The emission units meet the emission limitations without the use of a control device, therefore, 40 CFR Part 64 *Compliance Assurance Monitoring* is not applicable.

ATTACHMENT H

Plantwide Lead Compounds (20-11-1) Log

Date (Month/Year):

Fuel Source	Monthly Usage	Lead Compounds Emission Factor	Lead Compounds Emissions (ton/month)¹
Residual Oil	1000 gallons	0.0062 lb/1000 gallons	
Waste Oil	1000 gallons	2.2 lb/1000 gallons	
Natural Gas	MMscf	0.0005 lb/MMscf	
Monthly Lead Compounds Emissions (ton/month)²			
12-Monthly Rolling Total Lead Compounds Emissions (ton/yr)³			

¹Lead Compounds Emissions (ton/month) = Monthly Usage x Lead Compounds Emission Factor x 0.0005

²Monthly Lead Compounds Emissions (ton/month) = The sum of all Lead Compounds Emissions (ton/month).

³12-Month Rolling Total Lead Compounds Emissions (ton/yr) = The sum of the most recent 12 Monthly Lead Compounds Emissions (ton/month). **12-Month Rolling Total Lead Compounds Emissions less than or equal to 10 tons demonstrates compliance.**

ATTACHMENT L

Method 9 Opacity Observations

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

Readings ranged from _____ to _____ percent opacity.

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

ATTACHMENT M

10 CSR 10-6.260 Compliance Demonstration

This attachment may be used to demonstrate that the listed emission units are in compliance with 10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds*.

Allowable SO_x emission limitation for indirect heating sources is eight lb/MMBtu.

Emission Unit	Fuel	Emission Factor	Emission Factor (lb/MMBtu)	Emission Limit (lb/MMBtu)
9	Residual Oil	985.8 lb/1000 gallons	6.57	8
	Waste Oil	911.4 lb/1000 gallons	6.08	
10	Residual Oil	777.51 lb/1000 gallons	5.18	
	Waste Oil	718.83 lb/1000 gallons	4.79	

The emission factor of 159S lb/1000 gallons was taken from AP-42 Table 1.3-1 for residual oil #6 under SCC 10200402 (157S lb SO₂/1000 gallons + 2S lb SO₃/1000 gallons), where S is the weight percent of sulfur in the oil. The average heating value of 150,000 Btu/gallon for residual oil was taken from AP-42 Appendix A. Emission unit 9 is in compliance with this regulation while burning residual oil that contains ≤ 6.2 percent sulfur. Emission unit 10 is in compliance with this regulation while burning residual oil that contains ≤ 4.89 percent sulfur.

The emission factor of 147S lb/1000 gallons was taken from AP-42 Table 1.11-2 for waste oil under SCC 10301302, where S is the weight percent of sulfur in the oil. The average heating value of 150,000 Btu/gallon for waste oil mixed with residual oil was taken from AP-42 Section 1.11.3. Emission unit 9 is in compliance with this regulation while burning residual oil that contains ≤ 6.2 percent sulfur. Emission unit 10 is in compliance with this regulation while burning residual oil that contains ≤ 4.89 percent sulfur.

The emission units meet the emission limitation without the use of a control device; therefore, 40 CFR Part 64 *Compliance Assurance Monitoring* is not applicable.

ATTACHMENT N

10 CSR 10-6.400 Compliance Demonstration

This attachment may be used to demonstrate that the listed emission units are in compliance with 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes*.

Allowable PM emission limitation for sources having a process weight rate (P) of 30 ton/hr or less:

$$E = 4.1(P)^{0.67}$$

Potential PM Emission Rate = P (ton/hr) x PM Emission Factor (lb/ton)

Potential PM Concentration = $\frac{\text{Potential PM Emission Rate (lb/hr)} \times 7000 \text{ (gr/lb)}}{\text{Stack Flowrate (scf/min)} \times 60 \text{ (min/hr)}}$

Uncontrolled Calculations

Emission Unit	P (ton/hr)	PM Emission Factor (lb/ton)	Potential PM Emission Rate (lb/hr)	PM Emission Limit (lb/hr)	Potential PM Conc. (gr/scf)	PM Conc. Limit (gr/scf)	Is the uncontrolled Emission Unit in compliance?
8	1.3149	1.782	2.34	4.93	0.16	0.3	Yes
11	5.778	1.85	10.69	13.28	0.24		Yes
13A	0.639	1.738	1.11	3.04	0.06		Yes
20	0.873	0.9844	0.86	3.74	0.05		Yes
28	0.281	27	7.59	1.75	0.50		No
29	0.281	27	7.59	1.75	0.50		No
33	0.18	27	4.86	1.30	0.44		No
37	2.0	0.46	0.92	6.52	0.08		Yes
40	10.417	0.06	0.63	19.71	-		Yes
41	0.1164	14.47	1.68	0.97	0.12		No

Emission units 8 Norton & Timesaver Grinders, 11 Banbury Mixing, 13A 3C Cord Machine – Process Emissions, 20 Mill Mixing, 37 Neoprene Hopper Vent, and 40 Railcar Unloading Carbon Black are in compliance within this regulation without the aid of a control device; therefore, 40 CFR Part 64 *Compliance Assurance Monitoring* is not applicable.

ATTACHMENT N Continued

10 CSR 10-6.400 Compliance Demonstration

Controlled Calculations

Emission Unit	Uncontrolled Potential PM Emission Rate (ton/yr)	Control Device	Total Efficiency (Capture & Control)	Controlled Potential PM Emission Rate (lb/hr)	PM Emission Limit (lb/hr)	Controlled Potential PM Conc. (gr/scf)	PM Conc. Limit (gr/scf)
28	33.23	CD-28 Cyclone	79.2	1.58	1.75	0.10	0.30
29	33.23	CD-29A Cyclone	79.2	1.58	1.75	0.10	
33	21.29	CD-33 Cyclone	79.2	1.01	1.30	0.09	
41	15 ¹	CD-41A Cyclone	79.2	0.35	0.97	0.02	

¹Limited to 15 ton/yr of PM₁₀ by Special Condition 1 of Construction Permit 1103-238D (see Permit Condition 003).

Emission units 28 Polyrib Pirona Grinder, 29 Raw Edge V-Band Stone Grinder, 33 SM Form Grinder, and 41 Single Belt Grinders are in compliance with this regulation while operating the listed control device. These emission units uncontrolled potential PM emissions (ton/yr) are below the major source threshold of 100 ton/yr; therefore, 40 CFR Part 64 *Compliance Assurance Monitoring* is not applicable.

STATEMENT OF BASIS

Permit Reference Documents

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

- 1) Part 70 Operating Permit Application, received June 18, 2010
- 2) 2010, 2009, 2008, 2007, and 2006 Emissions Inventory Questionnaires
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
- 4) U.S. EPA's Factor Information Retrieval (FIRE) Date System 6.25
- 5) Construction Permit 1096-189D, Issued October 28, 1996, Amended October 6, 1999
- 6) Construction Permit 1096-190D, Issued November 6, 1996
- 7) Construction Permit 0798-196D, Issued July 14, 1998
- 8) Construction Permit 1199-206D, Issued November 30, 1999
- 9) Construction Permit 1103-238D, Issued November 24, 2003, Amended July 6, 2004
- 10) No Construction Permit Required Determination, Issued October 15, 2007
- 11) No Construction Permit Required Determination, Issued April 18, 2008

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100 *Alternate Emission Limits* is not applicable to this installation and has not been applied within this permit. The installation is in an ozone attainment area.

10 CSR 10-6.345 *Control of NO_x Emissions From Upwind Sources* is not applicable to the installation and has not been applied within this permit. The installation is located in Greene County.

Construction Permits

Construction Permit 1096-189D, Issued October 28, 1996, Amended October 6, 1999:

- This construction permit is for the installation of an industrial raw edge belt building and curing line.
- The amendment was to revise inaccurate solvent usages listed within the construction permit application.
- The original construction permit limited the new equipment to 15 ton/yr of VOC emissions; however, the amendment changes the special conditions, removing the 15 ton/yr limit and replacing it with the requirement to maintain VOC/HAP adhesive usage logs for their annual EIQ. The installation is required to maintain these records under 10 CSR 10-6.110(4)(A)'s Table 3. Due to the redundant nature of the requirements only 10 CSR 10-6.110 has been applied within this permit (see Section IV. Core Permit Requirements).

Construction Permit 1096-190D, Issued October 28, 1996, Amended November 6, 1996:

- This construction permit is for the replacement of #1 Banbury Body with a faster mixing body and the replacement of a mill with a larger twin screw mill (emission unit 11 Banbury Mixing).
- This construction permit was superceded by Construction Permit 1199-206D.

Construction Permit 0798-196D, Issued July 14, 1998:

- This construction permit is for the installation of a Platten Press Belt Building Process.
- This construction permit contains a special condition requiring the installation to maintain VOC/HAP adhesive usage logs for their annual EIQ. The installation is required to maintain these records under 10 CSR 10-6.110(4)(A)'s Table 3. Due to the redundant nature of the requirements, only 10 CSR 10-6.110 has been applied within this permit (see Section IV. Core Permit Requirements).

Construction Permit 1199-206D, Issued November 30, 1999:

- This construction permit is for modifications to #1 and #2 Banbury Body and 11 Banbury Mixing (twin screw conveyors).
- This construction permit supercedes Construction Permit 1096-190D.
- This construction permit contains special conditions which have been incorporated into this operating permit (see Permit Condition 002).

Construction Permit 1103-238D, Issued November 24, 2003, Amended July 6, 2004:

- This construction permit is for the installation of three belt lines to emission point 41 Single Belt Grinders.
- The amendment is for the installation of an additional belt line to emission point 41 (four belt lines total).
- This construction permit contains special conditions which have been incorporated into this operating permit (see Permit Condition 003).
 - Special Condition 3 requires the installation to perform monthly Method 22 visible emissions monitoring; however, the installation is already required to perform this monitoring by 10 CSR 10-6.220. Due to the redundant nature of the requirements, only 10 CSR 10-6.220 has been applied within this permit (see Permit Conditions 004 and 005).

No Construction Permit Required Determination, Issued October 15, 2007:

- This no construction permit required determination is for the installation of an additional dip tank to an existing oven in the 3C cord production line.

No Construction Permit Required Determination, Issued April 18, 2008:

- This no construction permit required determination is for the installation of an additional oven to the 3C Cord Machine and an additional dip tank.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subparts D, Da, Db, and Dc – *Standards of Performance for Steam Generating Units* are not applicable to the installation and have not been applied within this permit. Subparts D and Da regulations are only applicable to emission units with a steam generating capacity greater than 250 MMBtu/hr. [§60.40(a) and §60.40a(a)(1)] Subpart Db regulations are only applicable to emission units

with a steam generating capacity greater than 100 MMBtu/hr. [§60.40b(a)] Subpart Dc regulations are only applicable to steam generating units commencing construction after June 9, 1989. [§60.40c] All of the steam generating units at the installation are below 100 MMBtu/hr and were installed prior to 1979.

40 CFR Part 60, Subparts K, Ka, and Kb – *Standards of Performance for Liquid Storage Vessels* are not applicable to the installation and have not been applied within this permit. Subparts K and Ka are only applicable to petroleum liquid storage vessels with a storage capacity greater than 40,000 gallons. [§60.110(a) and §60.110a(a)] The installation has two storage tanks exceeding 40,000 gallons in capacity which hold fuel oil #6; however, fuel oil #6 is not a petroleum liquid as defined within §60.111(b) and §60.111a(b). Subpart Kb is applicable to volatile organic liquid storage vessels greater than or equal to 19,812 gallons. [§60.110b(a)] The installation has two fuel oil #6 storage tanks with a maximum true vapor pressure of 0.0009 kPa at 90°F – one 285,000 gallons tank and one 300,000 gallon tank; however, §60.110b(b) exempts storage tanks greater than 39,889 gallons with a maximum true vapor pressure less than 3.5 kPa.

40 CFR Part 60, Subpart BBB – *Standards of Performance for the Rubber Tire Manufacturing Industry* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to rubber tire manufacturing plants. [§60.540(a)] Tires are not one of the rubber products produced at the installation.

40 CFR Part 60, Subpart DDD – *Standards of Performance for Volatile Organic Compound (VOC) Emissions from the Polymer Manufacturing Industry* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to installations which manufacture the following polymers: polypropylene, polyethylene, polystyrene, or poly (ethylene terephthalate). [§60.560(a)] The installation does not manufacture any of the listed polymers.

40 CFR Part 60, Subpart VVV – *Standards of Performance for Polymeric Coating of Supporting Substrates Facilities* is not applicable to the installation and has not been applied within this permit. This regulation applies to each coating operation and any onsite coating mix preparation equipment used to prepare coatings for the polymeric coating of supporting substrates. [§60.740(a)] The installation does not meet the definition of polymeric coating of supporting substrates within §60.741(a) as the installation does not contain a web coating process.

40 CFR Part 60, Subpart IIII – *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* is not applicable to the installation and has not been applied within this permit. This regulation applies to stationary CI RICE constructed, modified, or reconstructed after July 11, 2005. [§60.4200(a)(2) and (a)(3)] Emission unit 39 Emergency Generator was installed at the installation in 1979 and has not been modified or reconstructed since.

Maximum Achievable Control Technology (MACT) Applicability

The installation is an area source of Hazardous Air Pollutants (HAPs).

40 CFR Part 60, Subpart T – *National Emission Standards for Halogenated Solvent Cleaning* is not applicable to the installation and has not been applied within this permit. This regulation applied to each

individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine. [§63.460(a)] The installation does not operate a cold cleaning machine.

40 CFR Part 60, Subpart OOOO – *National Emission Standards for Hazardous Air Pollutants: Printing, Coating, and Dyeing of Fabrics and Other Textiles* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to printing, coating, slashing, dyeing or finishing of fabric and other textiles at major HAP sources. [§63.4281(a) and (b)] The installation is not a major HAP source.

40 CFR Part 60, Subpart XXXX – *National Emissions Standards for Hazardous Air Pollutants: Rubber Tire Manufacturing* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to rubber tire manufacturing facilities at major HAP sources. [§63.5981(a)] Rubber tires are not produced at this installation.

40 CFR Part 60, Subpart ZZZZ – *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* is applicable to 39 Emergency Generator and has been applied within this permit (see Permit Condition 010).

40 CFR Part 60, Subpart HHHHHH – *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to paint stripping operations, autobody refinishing operations, and spray application of coating containing target HAPs. [§63.11169(a), (b), and (c)] The installation does not contain any of the listed operations.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61, Subpart M – *National Emission Standards for Asbestos* is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

Compliance Assurance Monitoring (CAM) Applicability

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

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

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

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

Greenhouse Gas Emissions

On May 13, 2010, EPA issued the GHG Tailoring Rule which set the major source threshold for CO₂e to be 100,000 ton/yr within 40 CFR Part 70. As of July 1, 2011, all Title V operating permits are required to include GHG emissions. Potential emissions of greenhouse gases (CO₂e) for this installation are calculated to be 51,726.29 tons, classifying the installation as a minor source of GHGs. Please note that

the potential emissions of greenhouse gases from this installation are only for stationary sources as §70.2 defines emission unit as “any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant or any pollutant listed under Section 112(b) of the Act.”

Other Regulatory Determinations

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is applicable to the installation and has been applied within this permit (see Permit Conditions 004 and 005). The following sources of visible air contaminants are subject to the rule, but while being properly maintained and operated, are not expected to exceed the opacity limit as their potential emissions of particulate are below 0.5 lb/hr; therefore, no monitoring, recordkeeping, or reporting requirements for these units have been included within the permit:

Emission Unit	Description
7	Babcox & Wilcox Boiler
13B	3C Cord Machine – Combustion Emissions
25, 26, and 27	(2) Vertical Sag, (2) Vertical Profilers, Skiver, Grinder
38	Pre-Compound
39	Emergency Generator

10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds* is applicable to the installation and has been applied within this permit (see Permit Conditions 006 and 007). The following SO_x emission sources only combust natural gas exempting them from this regulation per 10 CSR 10-6.260(1)(A)2:

Emission Unit	Description
7	Babcox & Wilcox Boiler
13B	3C Cord Machine – Combustion Emissions

10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes* is applicable to the installation and has been applied within this permit (see Permit Conditions 008 and 009). The following particulate emission sources are exempt from this regulation by 10 CSR 10-6.400(1)(B)6 as they are indirect heating sources:

Emission Unit	Description
7	Babcox & Wilcox Boiler
9	Keeler Boiler
10	Cleaver Brooks Boiler
13B	3C Cord Machine – Combustion Emissions

The following particulate emission sources are exempt from this regulation by 10 CSR 10-6.400(1)(B)12 as they have potential particulate emissions less than 0.5 lb/hr:

Emission Unit	Description
25, 26, and 27	(2) Vertical Sag, (2) Vertical Profilers, Skiver, Grinder
38	Pre-Compound
39	Emergency Generator

An updated potential to emit for this installation upon which the determinations in this Part 70 operating permit are based is shown in the following table:

Pollutant	Potential to Emit (ton/yr) ¹
CO	36.41
CO _{2e}	51,726.29
NH ₃	2.16
NO _x	137.72
PM ₁₀	185.38
PM _{2.5}	80.99
SO _x	2076.00
VOC	172.38
HAP	28.85
Toluene (108-88-3)	11.00
Carbon disulfide (75-15-0)	8.41
Lead Compounds (20-11-1)	5.45
4,4-Diphenylmethane Diisocyanate (101-68-8)	5.03
Carbonyl sulfide (463-58-1)	0.98
Hexane (110-54-3)	0.94
Hydrogen Chloride (76-47-01-0)	0.80
Methanol (67-56-1)	0.65
Styrene (100-42-5)	0.46
Arsenic Compounds (20-01-9)	0.27
Formaldehyde (50-00-0)	0.23
Methyl isobutyl ketone (108-10-1)	0.23
Nickel Compounds (20-14-4)	0.20
Dichloromethane (75-09-2)	0.18
Manganese Compounds (20-12-2)	0.17
Xylene (1330-20-7)	0.14
Acetophenone (98-86-2)	0.14
Hydrogen Fluoride (7664-39-3)	0.09
Perchloroethylene (127-18-4)	0.08
1,1,1-Trichloroethane (71-55-6)	0.06

¹Potential emissions for the installation are based upon 8,760 hours of uncontrolled operation unless otherwise noted:

- Boilers 9 and 10 are permitted to combust waste oil, natural gas, and residual oil. Waste oil was determined to be the worst case fuel for the following pollutants: Arsenic Compounds (20-01-9), Cadmium Compounds (20-04-2), Chromium Compounds (20-06-4), HAPs, Lead Compounds (20-11-1), Manganese Compounds (20-12-2), PM₁₀, and PM_{2.5}. Natural gas was determined to be the worst case fuel for the following pollutants: CO, CO_{2e}, and Hexane (110-54-3). Residual oil was determined to be the worst case fuel for the following pollutants: Formaldehyde (50-00-0), Hydrogen Chloride (7647-01-0), Hydrogen Fluoride (7664-39-3), NH₃, Nickel Compounds (20-14-4), NO_x, SO_x, Toluene (108-88-3), and VOC.
- Potential emissions for 11 Banbury Mixing, 13A - 3C Cord Machine – Process Emissions, 19 3C Cord Machine – Toluene Solvent Losses, 28 Polyrib Pirona Grinder, 29 Raw Edge V-Band Stone Grinder; 30, 31, and 32 Small Raw Edge Spray Booths, 35 R&D Banbury Mix, Mill Mix, and Compounding; 36 Plant Fugitives (excluding 3C Cord Machine), 37 Neoprene Hopper Vent, 38 Pre-Compound, and 41 Single Belt Grinders were based upon 2009 actual usage data scaled up to 8,760 hours.
- Potential emissions for 39 Emergency Generator were based upon 500 hours of annual operation due to the generator's emergency-only usage.

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 Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

Alana L. Rugen
Environmental Engineer

CERTIFIED MAIL: 70093410000190188773
RETURN RECEIPT REQUESTED

Mr. Gary Richards
Carlisle Transportation Products, Inc.
2601 W. Battlefield
Springfield, MO 65807

Re: Carlisle Transportation Products, Inc., 077-0004
Permit Number: **OP2011-059**

Dear Mr. Richards:

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.

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 Alana Rugen at 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:ark

Enclosures

c: Southwest Regional Office
PAMS File: 2010-06-060