



INTERMEDIATE STATE 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.

Intermediate Operating Permit Number: OP2013-048 **B**
Expiration Date: December 17, 2018
Installation ID: 031-0002
Project Number: 2014-06-015

Installation Name and Address

Delta Asphalt, Inc.-Cape Girardeau Plant
1200 Marquette Drive
Cape Girardeau, MO 63703
Cape Girardeau County

Parent Company's Name and Address

Delta Asphalt, Inc.
P.O. Box 880
Cape Girardeau, MO 63702

Installation Description:

Delta Asphalt Inc.-Cape Girardeau Plant is a batch mix asphalt plant. Processes include storage piles, material conveying, loading and unloading, material screening, weighing, mixing, product storage tanks, and a 109.9 MMBtu/hr dual fuel rotary dryer. The installation has accepted a voluntary limitation on particulate matter less than ten microns (PM₁₀) to qualify for this Intermediate Operating Permit. This is a permit amendment and therefore the expiration date has not changed.

Prepared by:
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Director or Designee
Department of Natural Resources

2/10/15

Effective Date

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Delta Asphalt Inc.-Cape Girardeau Plant is a batch mix asphalt plant. Processes include storage piles, material conveying, loading and unloading, material screening, weighing, mixing, product storage tanks, and a 109.9 MMBtu/hr dual fuel rotary dryer. The installation has accepted a voluntary limitation on particulate matter less than ten microns (PM₁₀) to qualify for this Intermediate Operating Permit.

This permit was originally assigned project #2011-03-002, and issued under permit #2013-048. On January 15, 2014, the Air Pollution Control Program was notified of a change in responsible official. The change was incorporated into this permit via letter, without changes made to the permit itself, see amendment #2013-048A.

On May 22, 2014, the Air Pollution Control Program was notified of the following changes:

1. The addition of one shop built cold feed bin (manufactured in 2004) to the RAP processing system (EP-02). This bin was not included in the original version of this Operating Permit.
2. The permittee has realized that they were using mistaken terminology when referencing a cyclone as a control device for the rotary dryer (EP03) and hot mix silos (EP-12). The cyclone is actually a drop out box, and there is no circulation as is typical of cyclones that are used as control devices. This change in terminology does not affect the control efficiency of the unit, since the manufacturer of the fabric filter bags claims a control efficiency of 99.5%, which was used in the original version of this Operating Permit. The permittee requests removal of the term cyclone from the permit.

This permit has been modified from the original to include the changes in responsible official, the addition of the cold feed bin, and the replacement of the term “cyclone” with “drop out box”. There are not changes to regulatory applicability or potential emissions. These are off permit changes and the permit has been amended for clarity.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2012	2011	2010	2009	2008
Particulate Matter ≤ Ten Microns (PM ₁₀)	5.28	5.28	4.49	4.49	9.42
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.20	0.20	0.17	0.17	0.20
Sulfur Oxides (SO _x)	0.21	0.21	0.58	0.58	4.08
Nitrogen Oxides (NO _x)	2.33	2.33	2.88	2.88	11.13
Volatile Organic Compounds(VOC)	1.92	1.92	1.64	1.64	1.97
Carbon Monoxide (CO)	37.45	37.45	32.67	32.67	37.21

Reported Air Pollutant Emissions, tons per year					
Pollutants	2012	2011	2010	2009	2008
Lead (Pb)	0.0	0.0	0.00	0.00	0.00
Hazardous Air Pollutants (HAPs)	0.0	0.0	0.00	0.00	0.00
Ammonia (NH ₃)	0.70	0.70	0.54	0.54	0.00

EMISSION UNITS WITH LIMITATIONS

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EP-02	Cold aggregate handling consisting of cold aggregate and RAP feed bins, and 2 cold aggregate/RAP conveyors (formerly EP-02A, EP-02B, & EP-05)
EP-03	Rotary Dryer with burner, hot bucket elevator, and batch tower (which includes screening unit, hot bins & weigh hopper), all ducted to a drop out box/fabric filter/dry lime injection units in series
EP-06	Mineral filler silo loading controlled by fabric filter
EP-12	Three hot mix silo controlled by drop out box/fabric filter/dry lime injection units in series

EMISSION UNITS WITHOUT LIMITATIONS

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

<u>Description of Emission Source (EIQ EP #)</u>
Aggregate/RAP Storage piles (EP-01)
Raw materials haul road (EP-04)
Product haul road (EP-07)
Diesel (12,337 gallon capacity) and recycled fuel oil tanks (19,193 gallon capacity) (EP-14)
Five asphalt cement tanks; 4 tanks 14,900 gallon capacity each, 1 tank 16,470 gallon capacity (EP-15)
Hot asphalt loadout to trucks (EP13)

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

Construction Permit Amendment #1196-004A and #0473-004A

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 on the date of permit issuance.

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required
Construction Permit Amendment #1196-004A and #0473-004A

Operational Limitation:

The installation is authorized to use recycled asphalt shingles (RAS) and reclaimed asphalt pavement (RAP) in the stationary asphalt plant operating at installation ID 031-0002. (Special Condition #1.A.)

Monitoring:

Guidelines regarding the use of RAP and RAS are not specifically addressed in the Special Conditions of these permit amendments. However, the cover letter accompanying these amendments does contain criteria for using RAP and RAS. This criteria is explained in detail in this Operating Permits Statement of Basis, in the Construction Permit History section.

PERMIT CONDITION PW002

10 CSR 10-6.020(2)(I)24. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

Emission Limitation:

The permittee shall emit less than 100 tons per year of carbon monoxide (CO) from the entire installation in any consecutive 12-month period.

Monitoring:

The permittee shall monitor the CO emissions from the entire installation.

Recordkeeping:

1. The permittee shall record the CO emissions on a monthly basis (see Attachment E).
2. The permittee shall use the provided attachments, or similar recordkeeping, to demonstrate compliance with this permit condition.
3. These records shall be kept for five (5) years and made available for inspection by the Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit exceeded the emission limitation listed above.
2. Reports of any deviations from monitoring other than the pressure drop range, recordkeeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

Batch Mix Asphalt Operations		
Emission Unit	Description	Manufacturer/Model #
EP-02	7 Cold aggregate, 2 RAP feed bins, and 2 cold aggregate/RAP conveyors (formerly EP-02A, EP-02B, & EP-05). Aggregate bins #3-6 constructed 1973, bins #1,2, and 7 constructed 1990, conveyor constructed 1992. RAP bins constructed 2004. Total MHDR=285 tons/hr	7 Aggregate bins & 1 RAP bin: shop built 1 RAP bin & conveyors: Barber Green
EP-03	Rotary Dryer with 109.9 MMBtu/hr burner (natural gas or fuel oil #2), hot bucket elevator, and batch tower (which includes screening unit, hot bins & weigh hopper), all ducted to a drop out box/fabric filter/dry lime injection units in series. Unit constructed 1973, fabric filter modified in 1974 and screen constructed 1993. Total MHDR=285 tons/hr	Barber Green, with Hauck burner; Diester (hot screen only). Dryer model # DC-70, hot tower model # BE101
EP-06	Mineral filler silo loading controlled by fabric filter. Silo constructed April 1973, fabric filter installed 1995. MHDR=2 tons/hr	Silo: Barber Green Filter: Gentec, Model # 360
EP-12	Three hot mix silo controlled by drop out box/fabric filter/dry lime injection units in series. Constructed 2005. MHDR=200 ton/hr each	Silos: Astec

Permit Condition (EP-02 through EP-12)-001

10 CSR 10-6.220

Restriction of Emissions of Visible Air Contaminants

Emission Limitation:

1. No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any **new** source any visible emissions with an opacity greater than 20%.
2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring/Recordkeeping/Reporting:

As detailed in Section IV-Core Permit Requirements.

Permit Condition (EP-03)-002

10 CSR 10-6.260

Restriction of Emission of Sulfur Compounds

Emission Limitation:

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

Operational Limitation/Equipment Specifications:

The emission unit shall be limited to burning fuel oil #2, recycled fuel oil, and/or natural gas with a sulfur content less than 0.5%.

Monitoring/Recordkeeping:

1. The permittee shall maintain an accurate record of the sulfur content of fuel used. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.
2. These records 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:

The permittee shall report any deviations/exceedances of this permit condition using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by Section V of this permit.

Permit Condition (EP-03)-003

10 CSR 10-6.400

Control of Emission of Particulate Matter From Industrial Processes

Emission Limitation:

1. The permittee shall not emit particulate matter from EP-03 in excess of 62.42 lbs./hr.
2. The permittee shall not emit particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic feet of exhaust gases.
3. The permittee shall operate the drop out box, fabric filter, and dry lime injection control system according to the manufacturer's specifications. These controls shall be used whenever the plant is operational.

Operational Limitations/Equipment Specifications:

The permittee shall comply with the following requirements for the control devices.

1. Baghouse:
 - (a) The baghouse shall be maintained such that the pressure drop remains in the normal operating range of two to eight inches of water whenever the emission units are in operation. A pressure

drop reading of less than two inches may be observed for a period following the installation of a new bag.

- (b) All instruments and control equipment shall be calibrated, maintained, and operated according to the manufacturer's specifications and recommendations.
 - (c) If the pressure drop falls out of the normal operating range, corrective action shall be taken as soon as practicable but within eight hours to return the pressure drop to normal.
2. Drop out box:
 - (a) The drop out box shall be maintained such that the pressure drop remains in the normal operating range. The pressure drop across the drop out box shall exceed three inches of water head whenever the emission unit is in operation.
 - (b) The permittee shall calibrate, maintain and operate the instrumentation and drop out box according to the manufacturer's specifications and recommendations.

Monitoring:

1. The permittee shall perform the following monitoring for the baghouse:
 - (a) Check and document the dust collector pressure drop daily, whenever the emission unit is in operation.
 - (b) Check and document the cleaning sequence of the dust collector every six months.
 - (c) Inspect bags for leaks and wear every six months.
 - (d) Inspect all components that are not subject to wear or plugging, including structural components, housing, ducts and hoods every six months.
2. The permittee shall perform the following monitoring for the drop out box:
 - (a) Check the air flow rate and the total static pressure drop across the drop out box once per working day when the process is in operation. If the pressure drop is less than 3 inches of water head, corrective action shall be taken as soon as practicable but within eight hours to return the pressure drop above the minimum allowable.
 - (b) Inspect the solids discharge valve for proper operation weekly.
 - (c) Inspect the structural components, including the drop out box ductwork and hoods for leaks and component failures quarterly.
 - (d) Check for leaks in the system to ensure airflow from the dirty side does not infiltrate the clean side annually.
 - (e) Verify that the inlet and outlet ductwork is in proper operating condition annually.
 - (f) Check the barrel and collecting tube for deposits and/or excess wear annually. Clean and repair as needed.
3. All instruments and control equipment shall be calibrated, maintained and operated according to the manufacturer's instructions.

Recordkeeping:

1. The permittee shall perform the following recordkeeping for the baghouse:
 - (a) Document all pressure drop readings. (see Attachment F)
 - (b) Record all inspections, corrective actions, and instrument calibration. (see Attachment D)
2. The permittee shall perform the following recordkeeping for the drop out box:
 - (a) Document all pressure drop readings. (see Attachment F)
 - (b) Record all inspections, corrective actions, and instrument calibration. (see Attachment C)
3. The permittee shall use the provided attachments, or similar recordkeeping, to demonstrate compliance with this permit condition.

4. These records shall be kept for five (5) years and made available for inspection by the Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission unit(s) exceeded the emission limitation(s) and/or pressure drop range listed above.
2. Reports of any deviations from monitoring other than the pressure drop range, recordkeeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), 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 on the date of permit issuance. The following is only an excerpt from the regulation or code, and is provided for summary purposes only

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 3) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for 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.
- 4) 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.

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

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and

- j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(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, §(5)(C)(1) and §(6)(C)3.B]

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

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

10 CSR 10-6.100 Alternate Emission Limits

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

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

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
- 2) The permittee may be required by the director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 5) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 Section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
- 6) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 7) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the director. The reports shall be submitted to the director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 8) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 9) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

10 CSR 10-6.150 Circumvention

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

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

Emission Limitation:

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

Monitoring:

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

The permittee shall maintain the following monitoring schedule:

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

Recordkeeping:

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

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

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.

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

Emission Limitation:

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee must maintain the following monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - b) Should the permittee observe no violations of this regulation during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) 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.
- 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:

The permittee shall maintain records of all observation results using Attachment B (or its equivalent), noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;
- 3) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions (see Attachment D); and,
- 5) The permittee shall maintain records of all USEPA Method 9 opacity tests performed (see Attachment C).

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

- 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

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

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, §(5)(E)2 and §(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, §(5)(C)1 and §(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) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than 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.
 - 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 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 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 §(5)(C)1 and §(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(5)(C)1.A General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the 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 the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(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(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
 - 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 a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - 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, 11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - 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.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Glen Graham, President. On January 15, 2014 the Air Pollution Control Program was informed that Glen Graham is no longer the responsible official and Rick Moody, Regional Manager, is now the responsible official. 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 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;
or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) The 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 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

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

VI. Attachments

Attachments follow.

Attachment C

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

Readings ranged from _____ to _____ % opacity.

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

Attachment E

Monthly and Yearly CO Tracking Record

This sheet covers the month of _____ in the year _____.

Column 1	Column 2	Column 3	Column 4
Equipment Description (Emission Point #)	CO Emission Factor (lbs CO/ton)	Amount of throughput (tons)	CO Emissions (Tons)
EP-03	0.4		
EP-12	0.00118		
(a) Total CO Emissions Calculated for this Month in Tons:			
(b) 12-Month CO Emissions Total from Previous Month's Worksheet B, in Tons:			
(c) Monthly CO Emissions Total (a) from Previous Year's Worksheet B, in Tons:			
(d) Current 12-month Total of CO Emissions in Tons: [(a) + (b) - (c)]			

Instructions:

Column 4= (Column 2 x Column 3)/2000

- (a) Summation of Column 4 in Tons;
- (b) 12-Month CO emissions total (d) from last month's Worksheet B, in Tons;
- (c) Monthly CO emissions total (d) from previous year's Worksheet B, in Tons;
- (d) Calculate the new 12-month CO emissions total. A 12-Month CO emissions total (e) of less than 100.0 tons indicates compliance.

Emission factor sources:

SCC 30500246 (combusting fuel oil #2) and SCC 30500245 (combusting natural gas) for EP-03, both have the same emission factor for carbon monoxide emissions; and SCC 30500213 for EP-12.

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

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) Intermediate Operating Permit Application, received February 28, 2011;
- 2) 2011 Emissions Inventory Questionnaire, received January 13, 2012; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) Construction Permit #0473-004;
- 5) Construction Permit #1196-004;
- 6) Construction Permit Amendment #1196-004A; and
- 7) Construction Permit Amendment #0473-004A.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

See Other Regulatory Requirements

Other Air Regulations Determined Not to Apply to the Operating Permit

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

See Other Regulatory Requirements

Construction Permit History

The following construction permits were issued to this installation:

- 1) Construction Permit #0473-004

This permit was issued on April 11, 1973, to authorize the construction of the original Barber-green asphalt batch plant, including a pug-mill. This permit does not contain any special conditions.

2) Construction Permit #1196-004

This permit was issued to authorize modification of an existing hot mix asphalt facility. The modification includes the installation of a Barber-Green-A849587 Pug-Mill, one diesel fired tank heater and one Hy-Way 15 LHTS. On February 6, 2006, the Air Pollution Control Program was notified via letter from Carol A. Hudak, that the pug mill had been removed from site. The diesel fired tank heater and LHTS have been removed also. Since all of the equipment authorized by this permit has been removed, the special conditions of this permit are not included in this Operating Permit.

3) Construction Permit Amendment, Permit # 1196-004A

This amendment was issued on January 19, 2011 to add the processing of recycled asphalt shingles (RAS) or reclaimed asphalt pavement (RAP). This project requires that RAS shall consist of asphalt roll roofing, cap sheets, and shingles, including underlayment, only. This project also prohibits the grinding of asphalt shingles that contain asbestos and any material that contains asbestos. Asbestos containing materials and shingles are requires to be transported to a landfill. The use of RAS or RAP which contains asbestos is prohibited. If any RAS or RAP is unidentified, or is suspect of containing asbestos, shall be rejected. Furthermore, all visible materials that are not part of the shingle, including, but not limited to extra wood, paper, metals, plastics, etc. are to be removed before grinding and the material to be processed must not have come into contact with hazardous materials.

4) Construction Permit Amendment #0473-004A

This amendment exists as an internal Air Pollution Control Program amendment. There is no physical amendment that was sent to the installation. This amendment is to clarify that Construction Permit Amendment #1196-004A was issued in error. At the time of issuance, the Air Pollution Control Program assumed that the RAS and RAP materials would be processed through the pug mill permitted under Construction Permit#1196-004, which is why that permit was amended. However, that pug-mill had been removed five years prior. The pug mill that is actually performing these operations is the original unit permitted in 1973. Had that been understood in 2011, the amendment would have been properly assigned to CP0473-004 and would have contained the same restrictions as detailed in Construction Permit Amendment #1196-004 regarding the type of materials that could be processed. These restrictions have been included in the Operating Permit as plant wide permit condition PW001.

New Source Performance Standards (NSPS) Applicability

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

This regulation applies to tanks with a capacity greater than 75 m³ (19,813 gallons).

The tanks have capacities less than 19,813 gallons. Therefore this rule does not apply.

40 CFR Part 60 Subpart I-Standards of Performance for Hot Mix Asphalt Facilities

This regulation applies to asphalt facilities which commenced construction or modification after June 11, 1973, is subject to the requirements of this subpart.

This hot mix asphalt facility was constructed prior to June 11, 1973, therefore this rule does not apply.

40 CFR Part 60 Subpart UU-Standards of Performance for Asphalt Processing and Asphalt Roofing Manufacture

This regulation applies to saturators and mineral handling and storage facilities at asphalt roofing plants; and asphalt storage tanks and blowing stills at asphalt processing plants, petroleum refineries, and asphalt roofing plants.

This installation is not an asphalt roofing plant, an asphalt processing plant, or a petroleum refinery, therefore this regulation does not apply.

Maximum Achievable Control Technology (MACT) Applicability

40 CFR Part 63 Subpart LLLLLL-National Emission Standards for Hazardous Air Pollutants: Asphalt Processing and Asphalt Roofing Manufacturing

This regulation applies to an asphalt processing facility or an asphalt roofing manufacturing facility that is a major source HAP emissions.

This installation is not an asphalt processing or asphalt roofing manufacturing facility, nor is it a major source of HAP emissions. Therefore, this regulation does not apply.

40 CFR Part 63 Subpart AAAAAAA-National Emission Standards for Hazardous Air Pollutants for Area Sources: Asphalt Processing and Asphalt Roofing Manufacturing

This regulation applies to an asphalt processing operation and/or asphalt roofing manufacturing operation that is an area source of hazardous air pollutant (HAP) emissions.

This installation is not an asphalt processing operation or asphalt roofing manufacturing operation. Therefore, this regulation does not apply.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None

Other Regulatory Determinations

Voluntary Condition

In order to qualify for this Intermediate Operating Permit, the installation has agreed to have a limitation of less than 100 tons per year of CO. This is different than the limitation of the previous Operating Permit, which contain limits on particulate matter less than ten microns (PM₁₀), sulfur oxides (SO_x), nitrogen oxides (NO_x) and CO. However, taking a limitation on the CO emissions indirectly limits all other criteria pollutants to less than the major source thresholds. The potential emissions of the installation are detailed in Tables 1 and 2 below:

Table 1: Detailed Potential Emissions by emission point

EP #	MHDR (ton/hr)	Pollutant	Ef (lb/ton)	Ef Source webFIRE SCC	Control Devices	Control Efficiency	Potential emissions (TPY)
EP-02	285	PM ₁₀	0.0064	30502503	none		7.99
EP-03	285	CO	0.4	30500246	Drop out box/fabric filter/dry lime injection	99.5% combined	499.32
		NO _x	0.12				149.80
		PM ₁₀	4.5				28.1
		PM _{2.5}	0.27				1.69
		SO ₂	0.088				109.85
		VOC	0.0082				10.24
		Lead	8.9E-7				0.001
		GHGs	37.007				46195.8
		HAPs	7.86E-3				9.8
EP-06	2	PM ₁₀	1.1	30501117	Fabric filter	64.5%	9.64
		Lead	5.2E-7				4.5E-6
		HAPs	9.0E-6				7.88E-5
EP-12	600	CO	.00118	30500213	Drop out box/fabric filter/dry lime injection	99.5% combined	3.1
		PM ₁₀	5.9E-4				1.55
		VOC	0.012				31.54
		GHGs	3.2E-5				0.8
		HAPs	3.2E-4				0.84

Notes:

1. The emissions of the following units are not shown in the table: EP-01, EP-04, EP-07, EP-13, (all fugitive sources) EP-14, and EP-15 (tanks).
2. EP-03 uses both SCC 30500246 and 30500245, to account for emissions of combusting fuel oil #2 and natural gas, respectively. For this analysis, SCC 30500246 was used, as it is the most conservative.
3. Control efficiencies: EP-03 has a federally enforceable requirement to use the control devices listed in Table 1 above (see Permit Condition (EP-03)-003). The potential emissions reflect the use of these control devices for EP-03. EP-06 and EP-12, while actually controlled by the listed control devices, do not have a federally enforceable requirement to use them. The potential emissions in Table 1 reflect the uncontrolled potential emissions for these units. The control efficiencies are provided for emissions reporting purposes.

Table 2: Potential Emissions by pollutant (sum of Table 1 potential emissions)

Pollutant	PTE from Table 1 (TPY)	Potential emissions scaled to 100 TPY CO voluntary limit
PM ₁₀	47.28	9.41
PM _{2.5}	1.69	0.34
CO	502.42	100
NO _x	149.8	29.81
SO ₂	109.85	10.93
VOC	41.78	8.31
GHGs (mass basis)	46196.6	9192.91
HAPs	10.64	2.12

Notes:

1. The emissions of the following units are not shown in the table: EP-01, EP-04, EP-07, EP-13, (all fugitive sources) EP-14, and EP-15 (tanks).
2. The sum of Lead emissions from Table 1 is less than 1, and is therefore omitted from this table.

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

From the point sources detailed in Table 1 above, this regulation applies only to EP-03, the Rotary Dryer and its' associated parts and controls. EP-02 and EP-06 are exempt per 6.400(1)(B)16., as their potential emissions are less than the limits imposed by this rule, and EP-12 is exempt per 6.400(1)(B)12., as its' potential emissions are less than 0.5 lbs/hr of particulate matter. The calculations for this regulation are shown in Table 3:

Table 3

EP#	MHDR	PM ₁₀ EF/ SCC code	Limit imposed by rule (E)	Uncontrolled Potential Emissions	Compliance/ Notes
EP-02	285	0.0064/ 30502503	62.42	1.82	Exempt per 16
EP-03	285	4.5/ 30500246	62.42	Uncontrolled=5617.4 Controlled with 99.5% efficiency =28.1	This unit is in compliance with this regulation as long as control devices operate with the claimed control efficiency.
EP-06	2	1.1/ 30501117	6.52	2.2	Exempt per 16
EP-12	600	5.9E-4/ 30500213	N/A	0.35	Exempt per 12

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).

Mr. Rick Moody
Delta Asphalt, Inc.-Cape Girardeau Plant
P.O. Box 880
Cape Girardeau, MO 63702

Re: Intermediate State Operating Permit Amendment
Amendment Number: OP2013-048B, Installation ID Number: 031-0002

Dear Mr. Moody:

The Department of Natural Resources, Air Pollution Control Program, has completed its review of your permit amendment notification to the Intermediate Operating Permit. This amendment notification is complete and is *accepted* as an amendment to your Air Operating Permit. Although the notification proposed changes that are considered off permit changes, the permit has been modified for clarity. Please note that you are required to operate your installation in compliance with this revised permit.

Pursuant to Missouri State Rule 10 CSR 10-6.065, *Operating Permits*, your operating permit is effective for a term of five years from the issuance date. This permit expires on December 17, 2018; you are required to submit an application for renewal of this operating permit at least six months prior to this expiration date.

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 (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions regarding this matter, please do not hesitate to contact Nicole Weidenbenner, P.E., at the Department of Natural Resources' 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:nwk

Enclosure

c: Southeast Regional Office
PAMS File: 2014-06-015