PART 70
PERMIT TO OPERATE

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

Operating Permit Number: OP2017-038
Expiration Date: APR 13 2022
Installation ID: 099-0014
Project Number: 2016-06-037

Installation Name and Address
The Dow Chemical Company, The Riverside Plant
500 Dow Industrial Drive
Pevely, MO 63070
Jefferson County

Installation Description:
The Dow Chemical Company, The Riverside Plant produces extruded polystyrene foam products. Polystyrene copolymer is mixed with additives en route to the die and forming process. The copolymer is extruded and the blowing agent is introduced to form Styrofoam. After the foam is created, it is then cooled, trimmed, and cut for wrapping and storage. The installation is a major source of particulate matter less than ten microns (PM$_{10}$).

Prepared by
Nicole Weidenbenner, PE
Operating Permit Unit

Parent Company's Name and Address
The Dow Chemical Company, The Riverside Plant
2030 Dow Center
Midland MI, 48674

Director or Designee
Department of Natural Resources

APR 13 2017
Effective Date
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I. Installation Equipment Listing

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

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-04</td>
<td>M/L Baghouse</td>
</tr>
<tr>
<td>EP-05</td>
<td>48&quot; Line Baghouse</td>
</tr>
<tr>
<td>EP-06</td>
<td>M/L Polystyrene Feed Hoppers</td>
</tr>
<tr>
<td>EP-07</td>
<td>48&quot; Line Polystyrene Feed Hoppers</td>
</tr>
<tr>
<td>EP-10</td>
<td>Central Vacuum System</td>
</tr>
<tr>
<td>EP-13</td>
<td>M/L Recycle Feed Hopper</td>
</tr>
<tr>
<td>EP-16</td>
<td>48&quot; Line Recycle Feed Hopper</td>
</tr>
<tr>
<td>EP-19</td>
<td>Polystyrene Storage Silo</td>
</tr>
<tr>
<td>EP-20</td>
<td>Recycle Storage Silo</td>
</tr>
<tr>
<td>EP-33</td>
<td>Polystyrene Storage Silo</td>
</tr>
<tr>
<td>EP-34</td>
<td>Silo Fines Removal Baghouse</td>
</tr>
<tr>
<td>EP-36</td>
<td>Polystyrene Hoppers</td>
</tr>
<tr>
<td>EP-37</td>
<td>Railcar &amp; Hopper Trucks</td>
</tr>
<tr>
<td>EP-57</td>
<td>340 HP Diesel Emergency Fire Pump</td>
</tr>
<tr>
<td>EP-57A</td>
<td>275 gallon diesel storage tank</td>
</tr>
<tr>
<td>EP-63</td>
<td>115 HP Natural Gas Emergency Generator</td>
</tr>
</tbody>
</table>

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS
The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance. These units are subject to all plant-wide conditions.

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-01</td>
<td>M/L Additive Feed Hoppers</td>
</tr>
<tr>
<td>EP-02</td>
<td>M/L Reclaim Feed Vent</td>
</tr>
<tr>
<td>EP-03</td>
<td>48&quot; Line Additive Feed Hoppers</td>
</tr>
<tr>
<td>EP-14</td>
<td>48&quot; Line Reclaim Feed Vent</td>
</tr>
<tr>
<td>EP-15</td>
<td>Die Vents</td>
</tr>
<tr>
<td>EP-17</td>
<td>Conversion Losses</td>
</tr>
<tr>
<td>EP-27C</td>
<td>Boiler #1 East</td>
</tr>
<tr>
<td>EP-27D</td>
<td>Boiler #2 West</td>
</tr>
<tr>
<td>EP-28</td>
<td>Post Die Finishing Losses</td>
</tr>
<tr>
<td>EP-39</td>
<td>Emissions From Storage</td>
</tr>
<tr>
<td>EP-44</td>
<td>134a Tank</td>
</tr>
<tr>
<td>EP-45</td>
<td>Empty Tank</td>
</tr>
<tr>
<td>EP-47</td>
<td>Facility Maintenance Painting</td>
</tr>
<tr>
<td>EP-58</td>
<td>Space Heaters</td>
</tr>
<tr>
<td>EP-64</td>
<td>R-152a Tank</td>
</tr>
</tbody>
</table>
II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations. The following conditions apply to all units contained in this permit, unless stated otherwise.

**Monitoring:**
The permittee shall calibrate, maintain and operate all pollution control devices and pollution monitoring related instruments according to the manufacturer’s recommendations or according to good engineering practices. All manufacturing specifications shall be kept on site.

**Recordkeeping:**
The permittee shall record all required record keeping (i.e. inspections and corrective actions) in an appropriate format. The permittee shall keep a copy of this Operating Permit and review on site as well as copies of all issued Construction Permits and reviews on site. Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations. All records must be kept for a minimum of 5 years and be made available to department personnel upon request.

**Reporting:**
1. The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition).
2. The permittee shall report any deviations from the operational 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.
3. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
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.

<table>
<thead>
<tr>
<th>Equipment subject to Permit Condition 1</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Unit</td>
</tr>
<tr>
<td>EP-04</td>
</tr>
<tr>
<td>EP-05</td>
</tr>
</tbody>
</table>

Permit Condition 1
10 CSR 10-6.060 Construction Permits Required
Construction Permit 092008-009A, Issued November 7, 2008

Operational Limitations:
1. Special Condition 1.A: The permittee shall control emissions from EP-04 and EP-05 using baghouses. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications. The baghouses 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. Special Condition 1.B: Replacement filters for the baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

Monitoring/Recordkeeping:
1. Special Condition 1.C: The permittee shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours while the emission units are operating. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
2. Special Condition 1.D: The permittee shall maintain an operating and maintenance log for the baghouses using Attachment D, or an equivalent, which shall include the following:
   a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
   b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc..

<table>
<thead>
<tr>
<th>Equipment subject to Permit Condition 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Unit</td>
</tr>
<tr>
<td>EP-04</td>
</tr>
<tr>
<td>EP-06</td>
</tr>
<tr>
<td>EP-07</td>
</tr>
<tr>
<td>EP-10</td>
</tr>
<tr>
<td>EP-13</td>
</tr>
<tr>
<td>EP-16</td>
</tr>
</tbody>
</table>
**Equipment subject to Permit Condition 2**

<table>
<thead>
<tr>
<th>Equipment ID</th>
<th>Equipment Description</th>
<th>Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-19</td>
<td>Polystyrene Storage Silo</td>
<td>1975</td>
</tr>
<tr>
<td>EP-20</td>
<td>Recycle Storage Silo</td>
<td>1975</td>
</tr>
<tr>
<td>EP-33</td>
<td>Polystyrene Storage Silo After 1967</td>
<td></td>
</tr>
<tr>
<td>EP-34</td>
<td>Silo Fines Removal Baghouse</td>
<td>1980</td>
</tr>
<tr>
<td>EP-36</td>
<td>Polystyrene Hoppers</td>
<td>After 1967</td>
</tr>
<tr>
<td>EP-37</td>
<td>Railcar &amp; Hopper Trucks</td>
<td>After 1967</td>
</tr>
</tbody>
</table>

**Permit Condition 2**

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

**Emission Limitation:**

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission sources any visible emissions with an opacity greater than 20 percent.
2. Exception for all units: The permittee may discharge into the atmosphere from any source of emissions for a period aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 40 percent.

**Monitoring:**

1. The permittee shall conduct visible emissions observations on each emission unit using the procedures contained in USEPA Test Method 22. The permittee is only required to make observations 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. Issuance of this renewal operating permit does not restart the 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 Attachments B, C, and D (or equivalents), 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; and,
5. The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

### Equipment subject to Permit Condition 3

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
</table>

### Permit Condition 3

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations

### Work Practices

1. The permittee shall comply with the following work practices: [§63.6603(a) and Subpart ZZZZ, Table 2d, item 4]
   a) Change oil and filter every 500 hrs of operation or annually, whichever comes first
   b) Inspect air cleaner every 1,000 hrs of operation or annually, whichever comes first; and
   c) Inspect all hoses and belts every 500 hrs of operation or annually, whichever comes first, and replace as necessary.
   d) Sources have the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2d of this subpart.
   e) If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practices on the schedule required in Table 2d of this subpart, or if performing the work practices on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the work practices can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The work practices should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources shall report any failure to perform the work practices on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

2. The permittee shall be in compliance with the work practices in this subpart that apply at all times. [§63.6605(a)]

3. At all times the permittee shall operate and maintain the affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.6605(b)]

4. The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)]

5. The permittee shall install a non-resettable hour meter if one is not already installed. [§63.6625(f)]
6. The permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [§63.6625(h)]

7. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d to this subpart. The oil analysis shall be performed at the same frequency specified for changing the oil in Table 2d to this subpart. 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 within two days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee shall change the oil within two days or before commencing operation, whichever is later. The permittee shall retain 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. [§63.6625(i)]

8. The permittee shall demonstrate continuous compliance with each work practice in Table 2d to this subpart that applies according to methods specified in Table 6 to this subpart by performing the following: [§63.6640(a) and Subpart ZZZZ, Table 6]
   a) Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or
   b) Develop and follow a maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

9. The permittee shall operate the emergency stationary RICE according to the requirements §63.6640(f)(1) through (4). Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in §63.6640(f)(1) through (4), is prohibited. If the permittee does not operate the engine according to the requirements in §63.6640(f)(1) through (4), the engine shall not be considered an emergency engine under this subpart and shall meet all requirements for non-emergency engines. [§63.6640(f)]
   a) There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]
   b) The permittee may operate the emergency stationary RICE for the purpose specified in §63.6640(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §63.6640(f)(3) and (4) counts as part of the 100 hours per calendar year allowed by §63.6640(f)(2).
      i. Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]
c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §63.6640(f)(2). Except as provided in §63.6640(f)(4)(ii), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]

i. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§63.6640(f)(4)(ii)]

A. The engine is dispatched by the local balancing authority or local transmission and distribution system operator. [§63.6640(f)(4)(ii)(A)]
B. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [§63.6640(f)(4)(ii)(B)]
C. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [§63.6640(f)(4)(ii)(C)]
D. The power is provided only to the facility itself or to support the local transmission and distribution system. [§63.6640(f)(4)(ii)(D)]
E. The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the permittee. [§63.6640(f)(4)(ii)(E)]

Recordkeeping:
1. The permittee shall retain the following records: [§63.6655(a)]
   a) A copy of each report submitted to comply with this subpart. [§63.6655(a)(1)]
   b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
   c) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
   d) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]
2. The permittee shall retain the records required in Table 6 of this subpart to show continuous compliance with each work practice that applies. [§63.6655(d)]
3. The permittee shall retain records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to their maintenance plan. [§63.6655(e)]
4. The permittee shall retain records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for
The permittee shall retain each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.6660(b)]

7. The permittee shall retain each record readily accessible in hard copy or electronic form for at least five years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660(c)]

**Reporting:**

1. The permittee shall report each instance in which the permittee did not meet the work practices in Table 2d to this subpart that apply. These instances are deviations from the emission and operating limitations in this subpart. These deviations shall be reported according to the requirements in §63.6650. [§63.6640(b)]

2. The permittee shall submit each report in Table 7 of this subpart that applies. [§63.6650(a)]

3. The permittee may submit the first and subsequent Compliance reports as part of their semi-annual monitoring report required by Section V of this permit. [§63.6650(b)(5)]

4. The Compliance report shall contain the following information: [§63.6650(c)]
   a) Company name and address. [§63.6650(c)(1)]
   b) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report. [§63.6650(c)(2)]
   c) Date of report and beginning and ending dates of the reporting period. [§63.6650(c)(3)]
   d) If a malfunction occurred during the reporting period, the compliance report shall 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 a malfunction of an affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction. [§63.6650(c)(4)]
   e) If there were no deviations from any work practices that apply, a statement that there were no deviations from the work practices during the reporting period. [§63.6650(c)(5)]

5. For each deviation from a work practice that occurs, the Compliance report shall contain the information in §63.6650(c)(1) through (4) and the following information: [§63.6650(d)]
   a) The total operating time of the stationary RICE at which the deviation occurred during the reporting period. [§63.6650(d)(1)]
   b) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [§63.6650(d)(2)]

6. The permittee shall report all deviations as defined in this subpart in the semi-annual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A). A Compliance report submitted pursuant to Table 7 of this subpart along with, or as part of, the semi-annual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) including all required information concerning deviations from any limitation in this subpart shall satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority. [§63.6650(f)]
**Equipment subject to Permit Condition 4**

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-63</td>
<td>115 HP Natural Gas Emergency Generator, 2006 model year, installed after June 12, 2006</td>
</tr>
</tbody>
</table>

**Permit Condition 4**

10 CSR 10-6.070 New Source Performance Regulations
40 CFR Part 60, Subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines

**Emission Standards:**
1. The permittee shall comply with the following emission standards [§60.4233(e) and Subpart JJJJ, Table 1]
   a) NOx+ HC: 10 g/HP-hr
   b) CO: 387 g/HP-hr
2. The permittee shall operate and maintain the stationary SI ICE to achieve the emission standards as required in §60.4233 over the entire life of the engine. [§60.4234]

**Operational Limitation:**
The permittee shall install a non-resettable hour meter upon startup of the emergency engine. [§60.4237(c)]

**Compliance Method:**
1. The permittee shall demonstrate compliance according to the following method: [§60.4243(b)]
   a) Demonstrating compliance with the emission standards specified in §60.4233(e) and according to the requirements specified in §60.4244 and according to the following: [§60.4243(b)(2)]
      i. The permittee shall keep a maintenance plan and records of conducted maintenance and shall, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee shall conduct an initial performance test to demonstrate compliance. [§60.4243(b)(2)(i)]
2. The permittee must operate the emergency stationary ICE according to the requirements in §60.4243(d)(1) through (3). In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in §60.4243(d)(1) through (3), is prohibited. If you do not operate the engine according to the requirements in §60.4243(d)(1) through (3), the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. [§60.4243(d)]
   a) There is no time limit on the use of emergency stationary ICE in emergency situations. [§60.4243(d)(1)]
   b) You may operate your emergency stationary ICE for any combination of the purposes specified in §60.4243(d)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §60.4243(d)(3) counts as part of the 100 hours per calendar year allowed in §60.4243(d)(2). [§60.4243(d)(2)]
      i. Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing
authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. [§60.4243(d)(2)(i)]

3. Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §60.4243(d)(2). Except as provided in §60.4243(d)(3)(i), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§60.4243(d)(3)]

   i. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§60.4243(d)(3)(i)]
   A. The engine is dispatched by the local balancing authority or local transmission and distribution system operator; [§60.4243(d)(3)(i)(A)]
   B. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [§60.4243(d)(3)(i)(B)]
   C. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [§60.4243(d)(3)(i)(C)]
   D. The power is provided only to the facility itself or to support the local transmission and distribution system. [§60.4243(d)(3)(i)(D)]
   E. The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator. [§60.4243(d)(3)(i)(E)]

**Performance Testing:**
While conducting performance tests, the permittee shall follow the procedures in §60.4244(a) through (e). [§60.4244]

**Notifications, Recordkeeping, and Reporting:**
1. The permittee shall meet the following notification, reporting and recordkeeping requirements: [§60.4245]
   a) The permittee shall retain records of the following information: [§60.4245(a)]
      i) All notifications submitted to comply with this subpart and all documentation supporting any notification. [§60.4245(a)(1)]
      ii) Maintenance conducted on the engine. [§60.4245(a)(2)]

2. The permittee shall retain records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [§60.4245(b)]
3. The permittee shall submit a copy of each performance test as conducted in §60.4244 within 60 days after the test has been completed. [§60.4245(d)]

4. For engines that operate or are contractually obligated to be available for more than 15 hours per calendar year for the purposes specified in §60.4243(d)(2)(ii) and (iii) or that operates for the purposes specified in §60.4243(d)(3)(i), you must submit an annual report according to the requirements in paragraphs §60.4245(e)(1) through (3).

<table>
<thead>
<tr>
<th>Equipment subject to Permit Condition 5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Unit</td>
</tr>
</tbody>
</table>

**Permit Condition 5**

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds
10 CSR 10-6.261 Control of Sulfur Dioxide Emissions

**Emission Limitations:**

1. The permittee shall not cause or permit the emission into the atmosphere of any gases containing more than 500 ppmv of sulfur dioxide or more than 35 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.

**Operational Limitation:**

No later than January 1, 2017, the permittee must accept for delivery only ultra-low sulfur distillate fuel oil with a maximum fuel sulfur content of 15 ppm.

**Monitoring/Recordkeeping:**

1. The permittee shall make all records available within 5 business days upon written or electronic request by the Director. The permittee shall furnish to the Director all data necessary to determine compliance status.

2. The permittee shall maintain the fuel supplier certification information to certify all fuel deliveries. Bills of lading and/or other fuel delivery documentation containing the following information for all fuel purchases or deliveries are deemed acceptable to comply with the recordkeeping requirements:
   a) The name, address, and contact information of the fuel supplier;
   b) The type of fuel; and
   c) The sulfur content or maximum sulfur content expressed in percent sulfur by weight or in ppm sulfur.
**Equipment subject to Permit Condition 6**

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU-57A</td>
<td>275 gallon diesel storage tank</td>
</tr>
</tbody>
</table>

**Permit Condition 6**

10 CSR 10-5.500 Control of Emissions From Volatile Organic Liquid Storage

**Recordkeeping:**
The permittee shall maintain readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel.
IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.

2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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

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

2) The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.

3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
4) Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.

5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

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

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

**10 CSR 10-6.065 Operating Permits**

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.


The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

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

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

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

1) The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.

2) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.

3) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo 643.079.

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

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.
**10 CSR 10-6.150 Circumvention**

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

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

This is a State Only permit requirement.

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

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

**Emission Limitation:**

1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.

2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

3) Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:

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

**Monitoring:**

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

The permittee shall maintain the following monitoring schedule:

1) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.

2) Should no violation of this regulation be observed during this period then-

   a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
   b) If a violation is noted, monitoring reverts to weekly.
   c) Should no violation of this regulation be observed during this period then-
i) The permittee may observe once per month.
ii) If a violation is noted, monitoring reverts to weekly.

3) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

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

1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
2) Whether equipment malfunctions contributed to an exceedance.
3) 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 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements**
The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

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

1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Any other monitoring methods approved by the director.

2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
   a) Monitoring methods outlined in 40 CFR Part 64;
b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and

c) Compliance test methods specified in the rule cited as the authority for the emission limitations.

3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:

a) Applicable monitoring or testing methods, cited in:
   i) 10 CSR 10-6.030, “Sampling Methods for Air Pollution Sources”;
   ii) 10 CSR 10-6.040, “Reference Methods”;
   iii) 10 CSR 10-6.070, “New Source Performance Standards”;
   iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”; 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.

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

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

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**10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations**

(Rescinded on February 11, 1979, Contained in State Implementation Plan)

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

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**10 CSR 10-5.120 Information on Sales of Fuels to be Provided and Maintained**

Every delivery of coal or residual fuel oil when first delivered to a consumer or wholesaler in the St. Louis metropolitan area must be accompanied by a ticket prepared in triplicate and containing at least the name and address of the seller and the buyer; the grade of fuel; ash content of coal, the source of the fuel, which must be an approved source, and such other information as the Air Conservation Commission may require. One copy of each ticket shall be kept by the person delivering the fuel and be retained for one year; one copy is to be given to the recipient of the fuel to be retained for one year; and, upon request, within 30 days after delivery of the fuel, the delivering party shall mail one copy to the Air Conservation Commission.

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**10 CSR 10-5.130 Certain Coals to be Washed**

The permittee shall not import, sell, offer for sale, exchange, deliver or transport for use and consumption in the St. Louis metropolitan area or use or consume in the said area any coal which as mined containing in excess of 2.0% sulfur or 12.0% ash calculated as described in 10 CSR 10-5.110, unless it has been cleaned by a process known as "washing" so that it shall contain no more than 12.0% ash on a dry basis. The term "washing" is meant to include purifying, cleaning, or removing impurities from coal by mechanical process, regardless of cleaning medium used.
40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
   b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.

2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
   c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
   d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
   e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
   f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.

3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

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

Federal Only - 40 CFR Part 82.
V. General Permit Requirements
The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

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

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

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

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

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

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

2) Reporting
   a) All reports shall be submitted to the Air Pollution Control Program, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
   b) The permittee shall submit a report of all required monitoring by:
      i) October 1st for monitoring which covers the January through June time period, and
      ii) April 1st for monitoring which covers the July through December time period.
   c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
   d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
      i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.
      ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semiannual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

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

f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065(6)(C)1.D Risk Management Plan Under Section 112(r)
If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

10 CSR 10-6.065(6)(C)1.F Severability Clause
In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

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

1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.

2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.

5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions
No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.
10 CSR 10-6.065(6)(C)1.1  Reasonably Anticipated Operating Scenarios

None

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

1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.

2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation’s right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
   a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
   b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
   c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
   d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.

3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
   a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
   b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.

4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
   a) The identification of each term or condition of the permit that is the basis of the certification;
   b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
   c) Whether compliance was continuous or intermittent;
   d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
   e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.
1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
   a) The applicable requirements are included and specifically identified in this permit, or
   b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.

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

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

1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
   a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
   b) That the installation was being operated properly,
   c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
   d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.

2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

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

1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.

a) Before making a change under this provision, the permittee shall provide advance written notice to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the APCP shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the APCP as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the APCP as soon as possible after learning of the need to make the change.

b) The permit shield shall not apply to these changes.

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

1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the permit, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:

a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;

b) The permittee must provide contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3 of this rule. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.

c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and

d) The permit shield shall not apply to these changes.

10 CSR 10-6.020(2)(R)34 Responsible Official

The application utilized in the preparation of this permit was signed by Kristen Popio, Site Leader. On October 5, 2016, the Air Pollution Control Program was informed that Ryan Osterman, Site Leader 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(6)(E)6 Reopening-Permit for Cause**

This permit may be reopened for cause if:

1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,

2) MDNR or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,

3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire; or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,

4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or

5) MDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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

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

**VI. Attachments**

Attachments follow.
# Attachment A

## Fugitive Emission Observations

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Visible Emissions</th>
<th>Abnormal Emissions</th>
<th>Cause</th>
<th>Corrective Action</th>
<th>Initial</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Beyond Boundary</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>No</td>
<td>Yes</td>
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</table>
### Attachment B
Visible Emission Observations

<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Emission Source</th>
<th>Visible Emissions</th>
<th>Excess Emissions</th>
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</thead>
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<tr>
<td></td>
<td></td>
<td></td>
<td>No</td>
<td>Cause</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Yes&lt;sup&gt;1&lt;/sup&gt;</td>
<td>Corrective Action</td>
</tr>
<tr>
<td>Initial</td>
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</tr>
</tbody>
</table>

<sup>1</sup> If there are visible emissions, the permittee shall complete the excess emissions columns.
## Attachment C

### Method 9 Opacity Emissions Observations

<table>
<thead>
<tr>
<th>Company</th>
<th>Observer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location</td>
<td>Observer Certification Date</td>
</tr>
<tr>
<td>Date</td>
<td>Emission Unit</td>
</tr>
<tr>
<td>Time</td>
<td>Control Device</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Hour</th>
<th>Minute</th>
<th>Seconds</th>
<th>Steam Plume (check if applicable)</th>
<th>Comments</th>
</tr>
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<tbody>
<tr>
<td></td>
<td></td>
<td>0</td>
<td>Attached</td>
<td>Detached</td>
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<td>0</td>
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<td>15</td>
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<td>1</td>
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<td>30</td>
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<td>45</td>
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### SUMMARY OF AVERAGE OPACITY

<table>
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<th>Set Number</th>
<th>Time</th>
<th>Opacity</th>
</tr>
</thead>
<tbody>
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<td>Start</td>
<td>End</td>
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</tbody>
</table>

Readings ranged from ____________ to ____________ % opacity.

Was the emission unit in compliance at the time of evaluation?  

YES  NO  Signature of Observer
## Attachment D

### Inspection/Maintenance/Repair/Malfunction Log

Emission Unit # ______________________________

<table>
<thead>
<tr>
<th>Date/Time</th>
<th>Inspection/Maintenance Activities</th>
<th>Malfunction Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Malfunction</td>
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<tr>
<td></td>
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</tbody>
</table>
STATEMENT OF BASIS

INSTALLATION DESCRIPTION
The Dow Chemical Company, The Riverside Plant produces extruded polystyrene foam products. Polystyrene copolymer is mixed with additives en route to the die and forming process. The copolymer is extruded and the blowing agent is introduced to form Styrofoam. After the foam is created, it is then cooled, trimmed, and cut for wrapping and storage. The installation is a major source of particulate matter less than ten microns (PM$_{10}$).

The installation’s emissions profile is shown in the table below. Reported emissions are taken from MOEIS for their respective years. Potential to emit was calculated for Operating Permit OP2011-061. There have been no changes to the installation since that time that would affect the potential emissions. Although the installation has the potential to emit above the major source threshold for PM$_{10}$, actual emissions are less than the reporting thresholds.

<table>
<thead>
<tr>
<th>Pollutants</th>
<th>Reported Emissions</th>
<th>Potential to Emit</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2011</td>
<td>2012</td>
</tr>
<tr>
<td>Particulate Matter ≤ Ten Microns</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(PM$_{10}$)</td>
<td>134.49</td>
<td></td>
</tr>
<tr>
<td>Particulate Matter ≤ 2.5 Microns</td>
<td></td>
<td></td>
</tr>
<tr>
<td>(PM$_{2.5}$)</td>
<td>1.34</td>
<td></td>
</tr>
<tr>
<td>Sulfur Oxides (SO$_x$)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Nitrogen Oxides (NO$_x$)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>1.17</td>
<td>0.95</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAPs)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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 16, 2016;
2) 2015 Emissions Inventory Questionnaire, received March 16, 2016;
4) webFIRE;
5) All documents listed in Construction Permit History; and
6) Operating Permit OP2011-061.
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.

10 CSR 10-6.261 Control of Sulfur Dioxide Emissions
This regulation was promulgated November 30, 2015 and applies to the diesel fuel fired emergency fire pump.

10 CSR 10-5.500 Control of Emissions From Volatile Organic Liquid Storage
This regulation does apply to the diesel storage tank. This regulation does not apply to the R-134a Tanks and R-152a Tank, because these materials do not meet the definition of a volatile organic liquid.

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 10-5.410 Control of Emissions From Manufacture of Polystyrene Resin
This regulation does not apply to this installation. This regulation applies to installations engaged in the manufacture of polystyrene resin. The permittee no longer produces polystyrene. The permittee purchases polystyrene.

10 CSR 10-5.510 Control of Emissions of Nitrogen Oxides
This regulation does not apply to the installation. This regulation applies to major sources of NOx. The permittee is not a major source of NOx.

10 CSR 10-5.520 Control of Volatile Organic Compound Emissions From Existing Major Sources
This regulation does not apply to the installation. This regulation applies to major sources of VOCs. The installation has never been a major source of VOC.

10 CSR 10-5.570 Control of Sulfur Emissions From Stationary Boilers
This regulation does not apply to the installation. This regulation applies to boilers and process heaters with a capacity of 50 MMBtu/hr or greater. The boilers (EP-27C Boiler #1 East and EP-27D Boiler #2 West) are rated at 4.185 MMBtu/hr each and EP-58 Space Heaters has a total capacity of 22.71 MMBtu/hr.

10 CSR 10-6.405 Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating
This regulation does not apply to the installation. 10 CSR 10-6.405(1)(E) exempts installations which exclusively combust natural gas.
Construction Permit History

The following construction permits were issued to this installation:

1. Construction Permit 0879-008
   This permit was issued August 1, 1979 for an expansion to the SAN process and the construction of the ABS process and polystyrene feedstock plant. This permit does not contain any special conditions.

2. Construction Permit 0382-002
   This permit was issued March 18, 1982 for the installation of a 200 HP natural gas fired steam generator. This permit does not contain any special conditions.

3. Construction Permit 0688-007
   This permit was issued June 20, 1988 for the installation of a zinc stearate additive system. This permit does not contain any special conditions.

4. Construction Permit 0688-008
   This permit was issued March 29, 1988 for the installation of a 30,000 gallon methyl chloride storage tank. This permit does not contain any special conditions.

5. Construction Permit 1291-005
   This permit was issued December 9, 1991 for the replacement of a 300 HP extruder motor and gearbox with a 500 HP motor and a 600 HP gearbox. Special conditions 1-3 contain a 481 tons VOC per year emission limit with supporting monitoring and recordkeeping. These conditions have not been applied in the permit. The permittee has switched blowing agents and removed the polystyrene since this special condition was applied, reducing the plant wide potential emissions to much less than the emission limit.

6. Construction Permit 0992-022
   This permit was issued September 21, 1992 for the combustion of polystyrene vapor within an existing boiler. This permit does not contain any special conditions.

7. No Permit Required Letter, PAMS 2000-12-025
   This determination was issued March 21, 2001 for an increase in production and switch to a non-VOC blowing agent.

8. No Permit Required Letter, PAMS 2005-05-076
   This determination was issued August 8, 2005 for the replacement of one water-based ink with another water-based ink for the logo printing on the extruded polystyrene production line.

9. Construction Permit 122005-003
   This temporary construction permit was issued December 6, 2005 for the testing of alternative blowing agents. The temporary construction permit deadline was extended in permit 122005-003A.

10. Construction Permit 122005-003A
    This permit amendment was issued December 6, 2007 to extend the deadline for the temporary construction permit to December 6, 2008.

11. Construction Permit 092008-009
    This permit was issued September 25, 2008 to permit changes for a different blowing agent. This permit was amended in permits 092008-009A and 092008-009B.

12. Construction Permit 092008-009A
    This permit amendment was issued November 7, 2008 to correct regulatory references in the original permit. This amendment replaces the special conditions of the original permit with amended conditions. These special conditions appear in the Operating Permit. Special Condition #1.E. allows the permittee the alternative of operating according to the provisions of
OP2006-069, Conditions EU0110-001 and EU0120-001 in lieu of Construction Permit Special Conditions #1A, 1C, and 1D. The permittee has chosen the option of demonstrating compliance with Special Conditions #1A, 1C, and 1D, which are included in the permit condition.

13. Construction Permit 092008-009B
This permit amendment was issued July 9, 2009 to modify the project description of the original permit. This amendment does not change any other aspect of the permit.

14. No Permit Required Letter, PAMS 2009-11-030
This determination was issued February 5, 2010 for the installation of the vacuum oven cleaner to remove hardened polymer from production equipment parts.

15. No Permit Required Letter, PAMS 2011-04-061
This determination was issued May 25, 2011 for the transfer of HFC-134a from EP-44 34a Tank or rail cars directly into tank trucks using truck mounted unloading equipment.

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

40 CFR part 60 Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971
40 CFR part 60 Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978
40 CFR part 60 Subpart Db, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units
40 CFR part 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

These regulations do not apply to the boilers. The minimum boiler size subject to these regulations is 10 MMBtu/hr. The boilers at this installation are rated at 4.185 MMBtu/hr each.

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

These regulations do not apply to the storage tanks. The storage tanks at this installation are not used to store petroleum liquids or liquids that meet the definition of volatile organic liquids. R-152a is also known as 1,1,-difluoroethane and R134a is also known as 1,1,1,2,-tetrafluoroethane, neither of which are considered VOCs due to their known lack of participation in atmospheric reactions to produce ozone.

40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
This regulation does not apply to the installation. This regulation applies to stationary CI ICE that were constructed after July 11, 2005. EP-57, 340 HP Diesel Emergency Fire Pump, was installed at the installation in 1995.
40 CFR Part 60, Subpart JJJJ, Standards of Performance for Stationary Spark Ignition Internal Combustion Engines
This regulation applies to EP-63, 115 HP Natural Gas Emergency Generator. The engine is a 2006 model year unit that was installed after June 12, 2006.

**Maximum Achievable Control Technology (MACT) Applicability**
This regulation applies to EP-63, Natural Gas Emergency Generator. However, the only requirement is §63.6590(c) which requires new stationary RICE located at an area source to meet the requirements of this part by meeting the requirements of 40 CFR Part 60, Subpart JJJJ for spark ignition engines. No further requirements apply under this part for that engine. This regulation also applies to EP-57, 340 HP Diesel Emergency Fire Pump. The engine is a 1995 model year with a 1995 installation date.

40 CFR Part 63, Subpart JJJJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources
This regulation does not apply to the installation. According to §63.11195(e), natural gas fired boilers are not subject to this subpart. Testing was conducted on January 10, 2013 resulting in emissions of 8.06 g NOx/BHP-hr and 1.33 g CO/BHP-hr, which are well below the limits contained in the rule of 10 g NOx/BHP-hr and 387 g CO/BHP-hr.

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**
None

**Compliance Assurance Monitoring (CAM) Applicability**
40 CFR Part 64, Compliance Assurance Monitoring (CAM)
The CAM rule applies to each pollutant specific emission unit that:
- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.
40 CFR Part 64 is not applicable to the installation and has not been applied within this permit. EP-10 Central Vacuum System is required to operate and maintain a baghouse to comply with 10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes; however, potential uncontrolled emissions from EP-10 were below the major source threshold.

**Greenhouse Gas Emissions**
Note that this source may be subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in Part 70 permits operating permits at this time. In addition, Missouri regulations do not require the installation to report CO2 emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO2 emissions were not included within this permit. If required to report, the applicant is required to report the data directly to EPA. The public may obtain CO2 emissions data by visiting [http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html](http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html).
### Other Regulatory Determinations

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

This regulation is applied in the permit. However, the following units are exempt:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Exemption</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-01</td>
<td>M/L Additive Feed Hoppers</td>
<td>(1)(O) vents inside building</td>
</tr>
<tr>
<td>EP-03</td>
<td>48” Line Additive Feed Hoppers</td>
<td>(1)(O) vents inside building</td>
</tr>
<tr>
<td>EP-27C</td>
<td>Boiler #1 East</td>
<td>(1)(L), combusts only natural gas</td>
</tr>
<tr>
<td>EP-27D</td>
<td>Boiler #2 West</td>
<td>(1)(L), combusts only natural gas</td>
</tr>
<tr>
<td>EP-58</td>
<td>Space Heaters</td>
<td>(1)(L), combusts only natural gas</td>
</tr>
<tr>
<td>EP-57</td>
<td>340 HP Diesel Emergency Fire Pump</td>
<td>(1)(A), internal combustion engines</td>
</tr>
<tr>
<td>EP-63</td>
<td>115 HP Natural Gas Emergency Generator</td>
<td>(1)(A), internal combustion engines</td>
</tr>
</tbody>
</table>

**10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes**

This regulation is not applied in the permit. All units that emit particulate matter meet an exemption, as detailed in the tables below:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>Exemption</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-01</td>
<td>M/L Additive Feed Hoppers</td>
<td>(1)(B)12., PTEu&lt;0.5 lb/hr</td>
</tr>
<tr>
<td>EP-03</td>
<td>48” Line Additive Feed Hopper</td>
<td>(1)(B)12., PTEu&lt;0.5 lb/hr</td>
</tr>
<tr>
<td>EP-04</td>
<td>M/L Baghouse</td>
<td>(1)(B)15., federally required control system&gt;90% overall control</td>
</tr>
<tr>
<td>EP-05</td>
<td>48” Line Baghouse</td>
<td>(1)(B)15., federally required control system&gt;90% overall control</td>
</tr>
<tr>
<td>EP-06</td>
<td>M/L Polystyrene Feed Hoppers</td>
<td>(1)(B)16. PTEu&lt;limit</td>
</tr>
<tr>
<td>EP-07</td>
<td>48” Line Polystyrene Feed Hoppers</td>
<td>(1)(B)16. PTEu&lt;limit</td>
</tr>
<tr>
<td>EP-13</td>
<td>M/L Recycle Feed Hopper</td>
<td>(1)(B)16. PTEu&lt;limit</td>
</tr>
<tr>
<td>EP-16</td>
<td>48” Line Recycle Feed Hopper</td>
<td>(1)(B)16. PTEu&lt;limit</td>
</tr>
<tr>
<td>EP-19</td>
<td>Polystyrene Storage Silo</td>
<td>(1)(B)16. PTEu&lt;limit</td>
</tr>
<tr>
<td>EP-20</td>
<td>Recycle Storage Silo</td>
<td>(1)(B)16. PTEu&lt;limit</td>
</tr>
<tr>
<td>EP-27C</td>
<td>Boiler #1 East</td>
<td>6.400(2), definition of process weight</td>
</tr>
<tr>
<td>EP-27D</td>
<td>Boiler #2 West</td>
<td>6.400(2), definition of process weight</td>
</tr>
<tr>
<td>EP-33</td>
<td>Polystyrene Storage Silo</td>
<td>(1)(B)16. PTEu&lt;limit</td>
</tr>
<tr>
<td>EP-34</td>
<td>Silo Fines Removal Baghouse</td>
<td>(1)(B)16. PTEu&lt;limit</td>
</tr>
<tr>
<td>EP-36</td>
<td>Polystyrene Hoppers</td>
<td>(1)(B)16. PTEu&lt;limit</td>
</tr>
<tr>
<td>EP-37</td>
<td>Railcar &amp; Hopper Trucks</td>
<td>(1)(B)16. PTEu&lt;limit</td>
</tr>
<tr>
<td>EP-57</td>
<td>340 HP Diesel Emergency Fire Pump</td>
<td>6.400(2), definition of process weight</td>
</tr>
<tr>
<td>EP-58</td>
<td>Space Heaters</td>
<td>6.400(2), definition of process weight</td>
</tr>
<tr>
<td>EP-63</td>
<td>115 HP Natural Gas Emergency Generator</td>
<td>6.400(2), definition of process weight</td>
</tr>
</tbody>
</table>
Calculation demonstrations for exemption (1)(B)12., $\text{PTE}_{u}<0.5$ lb/hr

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>MHDR (ton/hr)</th>
<th>PM Ef (lb/ton)</th>
<th>$\text{PTE}_{u}$ (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-01</td>
<td>M/L Additive Feed Hoppers</td>
<td>0.5</td>
<td>0.217</td>
<td>0.11</td>
</tr>
<tr>
<td>EP-03</td>
<td>48” Line Additive Feed Hopper</td>
<td>0.5</td>
<td>0.217</td>
<td>0.11</td>
</tr>
</tbody>
</table>

Calculation demonstrations for exemption (1)(B)16. $\text{PTE}_{u}<\text{limit}$

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>Description</th>
<th>P (ton/hr)</th>
<th>PM Ef (lb/ton)</th>
<th>PM potential (lb/hr)</th>
<th>PM Limit (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-06</td>
<td>M/L Polystyrene Feed Hoppers</td>
<td>10</td>
<td>0.2134</td>
<td>2.13</td>
<td>19.18</td>
</tr>
<tr>
<td>EP-07</td>
<td>48” Line Polystyrene Feed Hoppers</td>
<td>10</td>
<td>0.2134</td>
<td>2.13</td>
<td>19.18</td>
</tr>
<tr>
<td>EP-13</td>
<td>M/L Recycle Feed Hopper</td>
<td>2.5</td>
<td>0.2134</td>
<td>0.53</td>
<td>7.58</td>
</tr>
<tr>
<td>EP-16</td>
<td>48” Line Recycle Feed Hopper</td>
<td>2.5</td>
<td>0.2134</td>
<td>0.53</td>
<td>7.58</td>
</tr>
<tr>
<td>EP-19</td>
<td>Polystyrene Storage Silo</td>
<td>10</td>
<td>0.2134</td>
<td>2.13</td>
<td>19.18</td>
</tr>
<tr>
<td>EP-20</td>
<td>Recycle Storage Silo</td>
<td>10</td>
<td>0.2134</td>
<td>2.13</td>
<td>19.18</td>
</tr>
<tr>
<td>EP-33</td>
<td>Polystyrene Storage Silo</td>
<td>10</td>
<td>0.2134</td>
<td>2.13</td>
<td>19.18</td>
</tr>
<tr>
<td>EP-34</td>
<td>Silo Fines Removal Baghouse</td>
<td>25</td>
<td>0.0792</td>
<td>1.98</td>
<td>35.43</td>
</tr>
<tr>
<td>EP-36</td>
<td>Polystyrene Hoppers</td>
<td>25</td>
<td>0.2134</td>
<td>5.34</td>
<td>35.43</td>
</tr>
<tr>
<td>EP-37</td>
<td>Railcar &amp; Hopper Trucks</td>
<td>50</td>
<td>0.2134</td>
<td>10.67</td>
<td>44.58</td>
</tr>
</tbody>
</table>

\( ^a \)The particulate emission factor is based upon stack testing results. During the stack testing 1,000 lbs of pellets were transferred and emitted 0.1067 lbs of particulate emissions.

\( ^b \)The particulate matter emission factor is based upon stack testing results. During the stack testing 40,800,000 lbs of pellets were transferred and emitted 1,600 lbs of particulate emissions.

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds
This regulation was rescinded from the code of state regulations on November 30, 2015. However, this regulation is still included in Missouri’s State Implementation Plan (SIP) and is a federally enforceable regulation. This regulation must be included until it is removed from the SIP.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis
Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons:
1. The specific pollutant regulated by that rule is not emitted by the installation;
2. The installation is not in the source category regulated by that rule;
3. The installation is not in the county or specific area that is regulated under the authority of that rule;
4. The installation does not contain the type of emission unit which is regulated by that rule;
5. The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the APCP's satisfaction, the installation's compliance with that regulation(s). If the
installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the APCP a schedule for achieving compliance for that regulation(s).
Response to Public Comments

The draft Part 70 Operating Permit for The Dow Chemical Company, The Riverside Plant was placed on public notice March 3, 2017 for a 30-day comment period. The public notice was published on the Department of Natural Resources’ Air Pollution Control Program’s web page at: http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm. No public comments were received.
Dear Mr. Osterman:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at http://dnr.mo.gov/regions/. The online CAV request can be found at http://dnr.mo.gov/cav/compliance.htm.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:nwj

Enclosures

c: PAMS File: 2016-06-037