



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

JAN 08 2020

Mr. Todd Thomas
Manager of Regulatory Affairs
Elantas PDG, Inc.
5200 North Second Street
St. Louis, Missouri 63147

RE: New Source Review Permit - Project Number: 2019-10-010

Dear Mr. Thomas:

Enclosed with this letter is your permit to construct. Please study it carefully and refer to Appendix A for a list of common abbreviations and acronyms used in the permit. Also, note the special conditions on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files. Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

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 the following website: <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission 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 administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.oa.mo.gov/ahc.

Mr. Todd Thomas
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If you have any questions regarding this permit, please do not hesitate to contact Russell Osborne, at the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



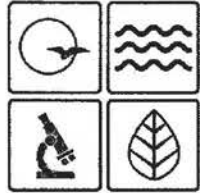
Susan Heckenkamp
New Source Review Unit Chief

SH:roa

Enclosures

c: St. Louis Regional Office
PAMS File: 2019-10-010

Permit Number: **012020-003**



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number: **012020-003**

Project Number: 2019-10-010
Installation Number: 510-0096

Parent Company: Altana AG

Parent Company Address: Abelstr. 45, Wesel, Germany 46483

Installation Name: Elantas PDG, Inc.

Installation Address: 5200 North Second Street, St. Louis, Missouri 63147

Location Information: North St. Louis City

Application for Authority to Construct was made for:

The weighing operations controlled by a baghouse. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

Standard Conditions (on reverse) are applicable to this permit.

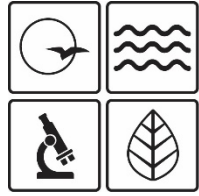
Standard Conditions (on reverse) and Special Conditions are applicable to this permit.



Director or Designee
Department of Natural Resources

JAN 08 2020

Effective Date



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

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Parent Company Address: Abelstr. 45, Wesel, Germany 46483

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Location Information: North St. Louis City

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Standard Conditions (on reverse) are applicable to this permit.

Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

Director or Designee
Department of Natural Resources

Effective Date

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Enforcement and Compliance Section of the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Enforcement and Compliance Section of the Department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available within 30 days of actual startup. Also, you must notify the Department's regional office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of the permit application and this permit and permit review shall be kept at the installation address and shall be made available to Department's personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 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 choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit using the contact information below.

Contact Information:
Missouri Department of Natural Resources
Air Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102-0176
(573) 751-4817

The regional office information can be found at the following website:
<http://dnr.mo.gov/regions/>

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted to the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (3)(E). "Conditions required by permitting authority."

Elantas PDG, Inc.
North St. Louis City County,

1. Control Device Requirement-Baghouse
 - A. Elantas PDG, Inc. shall control emissions from the weigh operation using a baghouse as specified in the permit application.
 - B. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications.
 - C. The baghouse 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 Department of Natural Resources' employees may easily observe them.
 - D. 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).
 - E. Elantas PDG, Inc. shall monitor and record the operating pressure drop across the baghouses at least once every day. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
 - F. Elantas PDG, Inc. shall maintain a copy of the baghouse manufacturer's performance warranty on site.
 - G. Elantas PDG, Inc. shall maintain an operating and maintenance log for the baghouses which shall include the following:
 - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2019-10-010
Installation ID Number: 510-0096
Permit Number:

Installation Address:

Elantas PDG, Inc.
5200 North Second Street
St. Louis, Missouri 63147

Parent Company:

Altana AG
Abelstr. 45
Wesel, Germany 46483

North St. Louis City County,

REVIEW SUMMARY

- Elantas PDG, Inc. has applied for authority to install a baghouse to control emissions from the weigh operations.
- The application was deemed complete on October 18, 2019.
- HAP emissions are expected from the proposed equipment. Refer to emission summary for details.
- None of the NESHAPs apply to this installation. None of the currently promulgated MACT regulations apply to the proposed equipment.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all criteria pollutants are below de minimis levels.
- This installation is located in North St. Louis City County, a nonattainment area for the 8-hour ozone standard and an attainment/unclassifiable area for all other criteria pollutants.
- This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2. The installation's major source level is 250 tons per year and fugitive emissions are not counted toward major source applicability.
- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.
- Emissions testing is not required for the baghouse as a part of this permit. Testing may be required as part of other state, federal or applicable rules.

- The installation currently holds a Part 70 State Operating Permit. An update to the Part 70 Operating Permit is required for this installation within one year of issuance of this permit.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

The Elantas PDG, Inc. facility located in north St. Louis, Missouri manufactures specialty polymers and coatings for the electrical and electronics industry, including wire varnish, wire enamel, and potting compounds. The facility is a minor source for NOx & VOCs and a de minimis source for all other pollutants. Elantas PDG, Inc. currently has a Part 70 Operating Permit being reviewed under Project No. 2017-10-048.

The following New Source Review permits have been issued to Elantas PDG, Inc. from the Air Pollution Control Program.

Table 1: Permit History

Permit Number	Description
94-11-132	Special Case Revision: Tank 31, Reactor 6
94-09-89	Four New Tanks
97-07-077A	New Steam Boiler 25
97-06-066SC	Special Case Permit: Thinning Tank
9801004SC	Nylon Process Tank
9807-039SC	Thinning Tank
00-04-018	Chemical Usage in Tanks
00-04-018F	Chemical Usage
01-11-034	Mixers
03-09-017PM	Metal Parts and Organics
04-04-007	Mixer
04-02-006	Mixer
04-12-024	Mixer
04-04-007	PTE Information
04-12-025	AI Reactor
05-11-011	20,000 Gal Tank
06-01-001	800 Gal Mixing Vessel
042007-012	Four Process Tanks
07-12-027	Process Tanks
08-03-005	Tank
09-05-012	Pressure Drop
122011-010	Boiler

PROJECT DESCRIPTION

The installation has applied for authority to construct a new baghouse in order to control particulate exposure in the weigh station. The facility proposes to install a Donaldson Torit DFO 3-18 Dust Collector manufactured in 2019 to be located in Building 2600 (B2600). The dust collector contains 18 filters with a filter area of 3,420 cubic feet and nine valves. The potential flow rate of the dust collector was provided as a range of

1,710-14,370 scfm. Although the installation is adding a control device, the weigh operation emissions were not previously included in the installation potential to emit calculations. Therefore, an emissions increase is associated with the project.

EMISSIONS/CONTROLS EVALUATION

The emissions calculations for this permit are based upon the supplied manufacturer specifications for the baghouse. According to the manufacturer, the maximum grain-loading for the baghouse air stream is 0.002 gr/scf and the maximum flowrate is 14,370 scfm. Air Pollution Control Program will accept a maximum grain-loading rate of 0.005 gr/scf without requiring testing. The emissions calculations include the maximum flowrate (14,370 scfm) with the 0.005 gr/scf grain loading; providing a maximum emissions increase of 0.62 lbs/hr of PM, PM₁₀, PM_{2.5}, and HAPs. Potential emissions for the project are greater than the insignificance levels for HAPs in 10 CSR 10-6.061, Construction Permit Exemptions (3)(A)3.A. The insignificance levels are based upon uncontrolled emissions, whereas, the emissions for this permit are controlled by a baghouse. Therefore, a permit is required for the project.

The following table provides an emissions summary for this project. Existing potential emissions were taken from Construction Permit 122011-010 and then adding emissions from the three subsequent no permit required determinations. Existing actual emissions were taken from the installation's 2018 EIQ. Potential emissions of the application represent the potential of the baghouse, assuming continuous operation (8760 hours per year).

Table 2: Emissions Summary (tpy)

Pollutant	Regulatory <i>De Minimis</i> / SMAL Levels	Existing Potential Emissions	Existing Actual Emissions (2018 EIQ)	Potential Emissions of the Project	New Installation Potential
PM	25.0	5.35	N/R	2.72	8.07
PM ₁₀	15.0	5.35	2.47	2.72	8.07
PM _{2.5}	10.0	5.05	2.47	2.72	8.07
SO _x	40.0	30.92	0.02	N/A	30.92
NO _x	40.0	108.98	6.83	N/A	108.98
VOC	40.0	125.24	6.72	N/A	125.24
CO	100.0	42.85	3.86	N/A	42.85
HAPs	10.0/25.0	6.56	1.46	2.72	9.28
Quinone (106-51-4)	5.0	N/D	N/R	2.72	2.72

N/A = Not Applicable; N/D = Not Determined; N/R Not Reported

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of all criteria pollutants are below de minimis levels.

APPLICABLE REQUIREMENTS

Elantas PDG, Inc. shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Operating Permits*, 10 CSR 10-6.065
- *Start-Up, Shutdown, and Malfunction Conditions*, 10 CSR 10-6.050
- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-6.165

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, it is recommended that this permit be granted with special conditions.

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated September 20, 2019, received October 4, 2019, designating Altana AG as the owner and operator of the installation.

APPENDIX A

Abbreviations and Acronyms

% percent	Mgal 1,000 gallons
°F degrees Fahrenheit	MWmegawatt
acfm actual cubic feet per minute	MHDRmaximum hourly design rate
BACT Best Available Control Technology	MMBtuMillion British thermal units
BMPs Best Management Practices	MMCFmillion cubic feet
Btu British thermal unit	MSDSMaterial Safety Data Sheet
CAM Compliance Assurance Monitoring	NAAQSNational Ambient Air Quality Standards
CAS Chemical Abstracts Service	NESHAPs National Emissions Standards for Hazardous Air Pollutants
CEMS Continuous Emission Monitor System	NO_xnitrogen oxides
CFR Code of Federal Regulations	NSPSNew Source Performance Standards
CO carbon monoxide	NSRNew Source Review
CO₂ carbon dioxide	PMparticulate matter
CO_{2e} carbon dioxide equivalent	PM_{2.5}particulate matter less than 2.5 microns in aerodynamic diameter
COMS Continuous Opacity Monitoring System	PM₁₀particulate matter less than 10 microns in aerodynamic diameter
CSR Code of State Regulations	ppmparts per million
dscf dry standard cubic feet	PSDPrevention of Significant Deterioration
EQ Emission Inventory Questionnaire	PTEpotential to emit
EP Emission Point	RACTReasonable Available Control Technology
EPA Environmental Protection Agency	RALRisk Assessment Level
EU Emission Unit	SCCSource Classification Code
fps feet per second	scfmstandard cubic feet per minute
ft feet	SDS Safety Data Sheet
GACT Generally Available Control Technology	SICStandard Industrial Classification
GHG Greenhouse Gas	SIPState Implementation Plan
gpm gallons per minute	SMAL Screening Model Action Levels
gr grains	SO_xsulfur oxides
GWP Global Warming Potential	SO₂sulfur dioxide
HAP Hazardous Air Pollutant	SSM Startup, Shutdown & Malfunction
hr hour	tph tons per hour
hp horsepower	tpy tons per year
lb pound	VMTvehicle miles traveled
lbs/hr pounds per hour	VOC Volatile Organic Compound
MACT Maximum Achievable Control Technology	
µg/m³ micrograms per cubic meter	
m/s meters per second	