



Missouri Department of dnr.mo.gov
NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

DEC 04 2019

Mr. Christopher Hagemann
FOL Tape, LLC
2025 Hitzert Court
Fenton, MO 63026-2506

Re: Intermediate Operating Permit
Installation ID: 189-0315, Permit Number: OP2019-034

Dear Mr. Hagemann:

Enclosed with this letter is your intermediate 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.

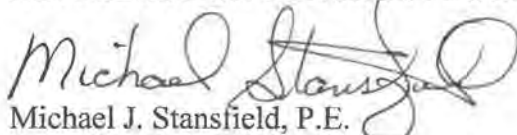
This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request 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 (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Berhanu Getahun at the St. Louis Regional Office, 7545 S. Lindbergh, Suite 210, St. Louis, MO 63125, or by telephone at (314) 416-2451. You may also contact me with the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM


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

MJS/bga

Enclosures

c: PAMS File: 2019-09-049





INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2019-034
Expiration Date: DEC 04 2024
Installation ID: 189-0315
Project Number: 2019-09-049

Installation Name and Address

FOL Tape, LLC
2025 Hitzert Court
Fenton, MO 63026-2506
St. Louis County

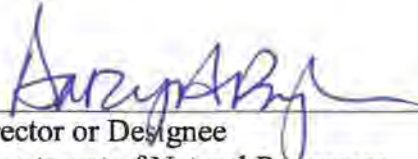
Installation Description:

FOL Tape, LLC was formed in July 2005. The company acquired certain assets related to the pavement tape operation of Allsafe Services and Materials on December 31, 2005. FOL Tape is a global provider of pavement-marking tapes and non-skid materials under the Flex-O-Line brand name. Flex-O-Line™ brand non-skid tape is a high friction, textured material designed for firm traction and durable protection.

FOL Tape, LLC is a major source for volatile organic compounds (VOCs) and hazardous air pollutants (HAPs), but is limited below the major source thresholds in Construction Permit 3039 and 6987 issued by St. Louis County Air Pollution Control Program.

DEC 04 2019

Effective Date


Director or Designee
Department of Natural Resources



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I. Installation Equipment Listing

EMISSION UNITS WITH LIMITATIONS

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

<u>Emission Unit #</u>	<u>Description of Emission Unit</u>
EU002	Paint-Application Line
EU003	Adhesive-Application Line

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

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

<u>Description of Emission Source</u>
Space Heating, Natural Gas: 0.9 MMBtu/hr.
Natural Gas Fired Thermal Oxidizer

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required

St. Louis County Air Pollution Control Program Construction Permit 3039, Issued July 9, 2007

St. Louis County Air Pollution Control Program Construction Permit 6987, Issued May 5, 2006

Emission Limitation: [Construction Permit Condition #1]

- 1) The permittee shall emit less than 100 tons of Volatile Organic Compounds (VOCs) from the entire installation in any consecutive 12-month period.
- 2) The permittee shall emit less than ten (10) tons per year of any individual Hazardous Air Pollutants (HAPs) and twenty-five (25) tons per year of total HAPs from the entire installation in any consecutive 12-month period.

Monitoring:

- 1) The permittee shall operate and monitor the thermal oxidizer whenever paint is applied on the controlled Roller-Coater (EU002). The permittee shall only operate the uncontrolled adhesive Roller-Coater shall only on days when the controlled Roller-Coater is or has operated such that the daily weighted averages of all coatings applied is 2.6 or less pounds of VOC per gallon as required under 10 CSR 10-5.330. [Construction Permit Condition #4]
- 2) The temperature of the thermal oxidizer shall be greater than 1100 degrees Fahrenheit (°F). [Construction Permit Condition #5]

Recordkeeping:

- 1) The permittee shall retain data sufficient to demonstrate compliance with
- 2) Emission Limitations 1) and 2). This data shall include at a minimum:
 - a) The date (month and year).
 - b) The amount of VOC material and HAP material handled by each emission unit during the month.
 - c) MSDS for each material containing VOC and/or HAP.
 - d) VOC and HAPs emission calculations and/or spreadsheets including VOC and HAPS emissions from natural gas and fuel oil combustion equipment.
 - e) Monthly VOC, combined HAP, and individual HAP emissions totals.
 - f) 12-Month rolling VOC, combined HAP, and individual HAP emissions totals.
 - g) Example forms are attached as Attachment A and B. The permittee may use these forms, or forms of its own, so long as the forms used will accurately demonstrate compliance with the VC and HAPs emission limitation. These forms shall be completed within ten (10) days of the end of each calendar month, maintained on site for the latest sixty (60) month period and made available to the Air Pollution Control Program, or its designated agent, at any reasonable time.
- 3) The permittee shall maintain all records required by this permit for not less than five years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheet (MSDS) for all materials used.

- 4) Recordkeeping shall be accomplished in accordance with the requirements of 10 CSR 10-6.065(5)(C)1.C, General Recordkeeping and Reporting Requirements, as stated in Section V of this permit.

Reporting:

- 1) Should the records indicate that a violation of any of the emission limits established in the construction permit condition #1 has occurred, FOL Tape shall notify the St. Louis County Air Pollution Control Program by no later than the next working day.
[Construction Permit Condition #3]
- 2) The permittee shall report to the Air Pollution Control Program's Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102 or AirComplianceReporting@dnr.mo.gov, no later than ten days after the end of the month during which the records indicate that the source exceeds the emissions limitations.
- 3) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

EU002 – Paint-Application Line, Horizontal Roller Coater EU003 – Adhesive-Application Line	
Emission Unit	Description
EU002	Paint-Application Line with Convection Oven: Horizontal Roller Coater with knife blade. Emissions exhaust to Alert custom thermal oxidizer.
EU003	Adhesive-Application Line with Infrared Oven: Adhesive application section of reflective tape manufacturing line. Emissions from the adhesive roller coater exhaust to atmosphere without control.

Permit Condition (EU002 and EU003) - 001
10 CSR 10-5.330 Control of Emissions From Industrial Surface Coating Operations

Emission Limitation:

The permittee shall not cause, allow, or permit the discharge into the ambient air of any VOCs in excess of two and six-tenths (2.6) pounds of VOC per gallon of coating (minus water and exempt compounds) as delivered to the coating applicator(s). [10 CSR 10-5.330(3)(F)2.]

Method and Determination of Compliance: [10 CSR 10-5.330(3)(F)3.]

- 1) VOC content of coatings – The permittee shall determine the daily volume-weighted average VOC content of all coatings used in the surface coating unit, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds), per 10 CSR 10-5.330(5)(C)3.A. The surface coating unit is in compliance if this value is less than or equal to the emission limits.
 - a) The daily volume-weighted average VOC content of all coatings used in a surface coating unit, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds), shall be calculated using the following equation:

$$DAVG_{vw} = \frac{\sum_{i=1}^n (A_i \times B_i)}{C}$$

Where:

DAVG_{vw} = daily volume-weighted average VOC content, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds);

A = daily gallons of each coating used (minus water and exempt compounds) in a surface coating unit;

C = total daily gallons of coatings used (minus water and exempt compounds) in a surface coating unit;

n = number of coatings used in a surface coating unit; and

B = VOC content of the coating as applied, expressed as pounds of VOC per gallon of coating (minus water and exempt compounds).

- b) VOC content of the coating as applied (B), expressed as pounds of VOC per gallon of coating (minus water and exempt compounds). This is determined using the following equation per Subparagraph (5)(C)1.A. of 10 CSR 10-5.330.

$$B = \frac{D_c \times W_o}{1 - \left(\frac{D_c \times W_w}{8.33} \right) - \left(\sum_{j=1}^m \frac{D_c \times W_{Ej}}{D_{Ej}} \right)}$$

Where:

D_C = density of coating as applied, expressed as pounds per gallon;

W_O = weight fraction of regulated VOC in the coating, as applied. This value does not include the weight fraction of water or exempt compounds;

W_W = weight fraction of water in the coating, as applied;

W_E = weight fraction of exempt compounds in the coating, as applied;

D_E = density of each exempt compound, expressed as pounds per gallon;

m = number of exempt compounds in the coating; and

8.33 = density of water, expressed as pounds per gallon.

- 2) Combination of VOC content of coatings and add-on controls – The permittee shall calculate the required control system efficiency per 10 CSR 10-5.330(5)(C)4.. The surface coating unit is in compliance if the actual overall control system efficiency is greater than or equal to the required control system efficiency; or
- 3) Control system - The overall control system efficiency must be ninety percent (90%) or greater.

Recordkeeping:

- 1) The permittee shall keep records as necessary to determine compliance. Records kept should be appropriate for the facility, their products, and operations. These may include, as applicable, one (1) or more of the following:
- a) Current list of coatings used and the VOC content as applied;
 - b) Daily volume usage of each coating;
 - c) Records of the weighted average VOC content for each coating type included in averaging for coating operations that achieve compliance through coating VOC content;
 - d) Annual VOC emissions from surface coating equipment cleaning; and
 - e) All test results to determine coating properties.
- 2) Records such as daily production rates may be substituted for actual daily coating use measurements provided the permittee submits a demonstration, approved by the Director, that these records are adequate for the purposes of this rule.
- 3) The permittee may use Attachments C and D for recordkeeping 1 and 2, or equivalent forms of its own, so long as the forms used will accurately demonstrate compliance with the recordkeeping requirements of 1 and 2.
- 4) The permittee shall maintain daily records of key system operating parameters for emission control equipment including, but not limited to:
- a) Identification of the type of emissions control system used;
 - b) Hours of operation;
 - c) Routine and non-routine maintenance, including dates and duration of any outages;

- d) Records of test reports conducted;
- e) For the thermal oxidizer the permittee shall comply with the following requirements:
 - i) Continuous temperature monitoring and recording equipment shall be installed and operated to accurately measure the operating temperature(s) for the control device; and
 - ii) The following information shall be collected and recorded each day of operation of the surface coating unit and the control device:
 - (1) A log or record of the operating time for the control device, monitoring equipment, and the associated surface coating unit;
 - (2) For thermal oxidizers, all three (3)-hour periods of operation during which the average combustion temperature was more than fifty degrees Fahrenheit (50 °F) below the average combustion temperature during the most recent emission test that demonstrated that the surface coating unit was in compliance;
- 5) The required records shall be retained by the permittee for a minimum of five (5) years. These records shall be made available to the director upon request.

Reporting:

- 1) The permittee shall provide a written report to the Missouri Department of Natural Resources Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov, no later than twenty (20) days after the permittee determined that the emission unit exceeded the emission limitation.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The following 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 make such permit available within a reasonable period of time to any Missouri Department of Natural Resources personnel upon request.

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

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

10 CSR 10-6.110 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 submit full EIQ's per the schedule in the rule. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 4) In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

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.

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

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

**10 CSR 10-6.250 Asbestos Abatement Projects
Certification, Accreditation, and Business Exemption Requirements**
This is a State Only permit requirement.

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.

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

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

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

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

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

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

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

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

V. General Permit Requirements

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

Permit Duration

10 CSR 10-6.065, §(4)(C)1, §(5)(C)1.B, §(4)(E)2.C

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.

General Record Keeping and Reporting Requirements

10 CSR 10-6.065, §(4)(C)1 and §(5)(C)1.C

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 available within a reasonable period of time 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 or AirComplianceReporting@dnr.mo.gov.
- b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
- c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
- 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 (5)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of

emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit.
- 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.

Risk Management Plan Under Section 112(r)

10 CSR 10-6.065 §(4)(C)1 and §(5)(C)1.D

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.

General Requirements

10 CSR 10-6.065(4)(C)1.A

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

Reasonably Anticipated Operating Scenarios

10 CSR 10-6.065(4)(C)1.C

There are no reasonably anticipated operating scenarios.

Compliance Requirements

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

- 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 the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

Emergency Provisions

10 CSR 10-6.065, §(4)(C)1 and §(5)(C)7

- 1) An emergency or upset as defined in 10 CSR 10-6.065(5)(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.

Off-Permit Changes

10 CSR 10-6.065(4)(C)5

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - 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 written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

Responsible Official

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

The application utilized in the preparation of this permit was signed by Christopher Hagemann, President. 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.

Reopening-Permit for Cause

10 CSR 10-6.065 §(4)(E)4 and §(5)(E)6.A(III)(a)-(c)

This permit may be reopened for cause if:

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

Statement of Basis

10 CSR 10-6.065 §(4)(E)1.A and §(5)(E)1.C

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

Facility-Wide VOC Tracking Record

This record keeping sheet or an equivalent sheet may be used to meet the record keeping requirements for Permit Condition PW001

This sheet covers the month of _____ in the year _____

Material Used ¹ (Name)	Amount of Material Used Including Units	Density ² (lbs/gal)	VOC Content ³ (Weight %)	Monthly VOC Emission ⁴ (tons)
Natural Gas Combustion Sources	Monthly Usage (MMscf)	VOC Emission Factor ⁵ (lb/MMscf)		Monthly VOC Emissions ⁶ (tons)
		5.5		
Plantwide Monthly VOC Emissions (tons) ⁷:				
Plantwide 12-Month Rolling Total VOC Emissions (tons) ⁸:				

- 1 List all materials containing VOC used by EP002 and EU003.
- 2 As listed on the SDS for the material. If the specific gravity (s.g.) is provided instead, Density (lb/gal) = s.g. x 8.33.
- 3 As listed on the SDS for the material. If a range of values is provided, use the highest value in the range to demonstrate compliance.
- 4 Monthly VOC Emissions (tons) = Monthly Usage (gallons) x Density (lb/gal) x VOC Content (wt %) x 0.0005 (ton/lb).
- 5 VOC Emission Factor obtained from AP-42 Table 1.4-2.
- 6 Monthly VOC Emissions (tons) = Monthly Usage (MMscf) x VOC Emission Factor (lb/MMscf) x 0.0005 (ton/lb).
- 7 Plantwide Monthly VOC Emissions (tons) = The sum of all Monthly VOC Emissions (tons) from each material used by EU002 and EU003 + Monthly VOC Emissions from Natural Gas Combustion.
- 8 Plantwide 12-Month Rolling Total VOC Emissions (tons) = The sum of the 12 most recent Plantwide Monthly VOC Emissions (tons) + the sum of all start-up, shutdown, and malfunction VOC emissions as reported to the Air Pollution Control Program’s Compliance/Enforcement Section during the most recent 12 month period.

Attachment D

Surface Coating Operations Compliance Demonstration

10 CSR 10-5.330, Control of Emissions From Industrial Surface Coating Operations - Compliance Demonstration - Sample Record Form

Date	Coating Ingredient	Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H
		Enter These Values from Coating Formulation Data				Coating Volume Fraction (minus water & non-VOC organic compounds)	Daily Coating Gallons Used (minus water & non-voc organic compounds)	lbs VOC per Gallon (minus water & non-voc organic compounds)	Volume-Weighted Daily lbs of VOC
		Daily Coating Gallons Used	lbs VOC per Gallon of Coating	Water Volume Fraction of Coating	Non-VOC Organic Compounds Volume Fraction of Coating				
Sum of Column F (gallons):									
								Sum of Column H (lbs)	
¹Daily Volume-Weighted Average (DAVG_{vw}) = _____ lbs of VOC/gal coating (less water & non-VOC organic Compounds)									

Note 1: Daily Volume-Weighted Average (DAVG_{vw}) = [Sum of Column H ÷ Sum of Column F]

Instructions:

1. Enter values for Columns A, B, C and D from coating formulation data.
2. Calculate volume fraction of coating (minus water & non-VOC organic compounds): [Column E = 1 – (Column C + Column D)]
3. Calculate the daily coating used (minus water & non-voc organic compounds) in gallons in Column F by multiplying daily coating used in gallons [Column A] by volume fraction of coating (minus water & non-VOC organic compounds) (Column E): Column F = [Column A x Column E]
4. Calculate lbs VOC per gallon (minus water & non-voc organic compounds) per coating ingredient in Column G by dividing lbs of VOC per gallon of coating (Column A) by volume fraction of coating (minus water & non-VOC organic compounds) (Column E): Column G = [Column B ÷ Column E]
5. Calculate the volume weighted daily lbs of VOC in Column H per coating ingredient by multiplying the daily coating gallons used (minus water & non-VOC organic compounds) (Column F) by lbs VOC per gallon (minus water & non-voc organic compounds) per coating ingredient (Column G): Column H = [Column F x Column G]

Calculate Daily Volume-Weighted Average (lbs of VOC per gal coating (less water & non-VOC organic compounds)) by dividing the daily sum of Column H by daily sum of Column F.

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(4)(C)1.A.(VI), if these limitations are exceeded, the installation becomes subject to 10 CSR 10-6.065(5) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

INSTALLATION DESCRIPTION

FOL Tape, LLC was formed in July 2005. The company acquired certain assets related to the pavement tape operation of Allsafe Services and Materials on December 31, 2005. FOL Tape is a global provider of pavement-marking tapes and non-skid materials under the Flex-O-Line brand name. Flex-O-Line™ brand non-skid tape is a high friction, textured material designed for firm traction and durable protection; and provide excellent nighttime delineation during either dry or light-to-moderate rainfall. The tape is precoated with a pressure sensitive adhesive for convenient application. The markings readily conform to surfaces when tamped and are immediately ready for pedestrian traffic following application.

The manufacturing process begins with a thin sheet of raw aluminum which is approximately five feet wide and brought to the installation in large rolls. The aluminum roll is placed on the reflective tape manufacturing machine and paint (yellow, white or black) is applied to the length of it. The paint is pumped onto the aluminum sheet from 55 gallon drum and is not mixed or thinned prior to application. Once the paint is applied the entire process becomes enclosed. Small glass beads are dropped onto the wet paint from hoppers which are filled by hand. The paint material is then dried with infrared lamps to a temperature of 800 degrees Fahrenheit (°F), then by a natural gas oven which is set to 320°F. The aluminum sheet is then placed back on a roll and taken to reflective tape manufacturing machine to have adhesive placed on the opposite side from the paint and glass beads. The aluminum sheet is unrolled so that the tape underside is up and an adhesive is pumped onto it in the same manner as paint was to the opposite side. The material then travels through five enclosed infrared ovens which heat the adhesive to approximately 1060°F. Heating the adhesive is performed so that it will not flow off the aluminum. The product is then rolled up and taken to a machine which slices the material to the width of roadway lines. The adhesive and paint roller-coating machines are vented to a thermal oxidizer. Preventative maintenance and inspections of the thermal oxidizer are performed quarterly by an outside firm.

This installation no longer performs paint mixing or thinning. All paints are applied as they come from the paint manufacturer. Acetone is used for clean-up.

FOL Tape, LLC was a major source of hazardous air pollutants (HAP) on December 2, 2004, when it was required to begin complying with 40 CFR Part 63 Subpart JJJJ. In July 2007, FOL Tape, LLC was issued a construction permit limiting the HAP emissions to below the 10/25 tons threshold.

Whether a facility needs to comply permanently with a MACT standard or not was determined by EPA's March 16, 1995, "Potential to Emit for MACT Standards-Guidance on Timing Issues", which was also

known as the "Once In Always In (OIAI)" policy. This policy clarifies that facilities that are major sources of HAPs on the first compliance date of the standard are required to comply permanently with the MACT standard. A source required to comply with MACT requirements applicable to major sources is also be required to obtain a Part 70 Permit. EPA’s new guidance memorandum of 2018, superseded what was contained in the May 1995 Memorandum and the OIAI policy stated in the May 1995 is withdrawn. According to the 2018 EPA’s “Reclassification of Major Sources as Area Sources” memorandum, a major source becomes an area source at such time that the source takes an enforceable limit on its HAPs potential emissions below the major source thresholds (i.e., 10 tons per year (tpy) of any single HAP or 25 tpy of any combination of HAP). In such circumstances, a source that was previously classified as major, and which so limits its PTE, will no longer be subject either to the major source MACT or other major source requirements that were applicable to it as a major source under CAA section 112.

Because of the OIAI policy, FOL Tape, LLC was subject to the Maximum Achievable Control Technology (MACT) standard of 40 CFR Part 63 Subpart JJJJ and was also required to obtain a Part 70 Permit. On September 11, 2019 FOL Tape, LLC submitted an Intermediate Operating Permit application to change the operating permit type from Part 70 to Intermediate.

This installation is not on the List of Named Installations found in 10 CSR 10-6.020(3)(B), Table 2.

Updated Potential to Emit for the Installation and Reported Air Pollutant Emissions, in tons per year

Pollutants	Potential Emissions ¹	Reported Emissions				
		2018	2017	2016	2015	2014
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.37	—	—	—	—	—
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.37	—	—	—	—	—
Sulfur Oxides (SO _x)	0.003	—	—	—	—	—
Nitrogen Oxides (NO _x)	4.91	—	—	—	—	—
Volatile Organic Compounds (VOC)	<100	10.26	8.84	16.46	19.47	35.19
Carbon Monoxide (CO)	0.27	—	—	—	—	—
Hazardous Air Pollutants (HAPs)	<10/25	2.41	3.67	2.89	3.46	6.05

¹Each emission unit was evaluated at 8,760 hours of uncontrolled annual operation unless otherwise noted.

- VOC Emissions are limited to less than 100 tons per year by the St. Louis County Air Pollution Control Program Construction Permit 3039 and 6329.
- HAP Emissions are limited to less than 10/25 tons per year by the St. Louis County Air Pollution Control Program Construction Permit 3039 and 6329.

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received September 26, 2019;
- 2) Part 70 Operating Permit Application, received August 4, 2007; revised July 26, 2007;
- 3) 2018 Emissions Inventory Questionnaire, received April 7, 2019;
- 4) U.S. EPA document AP-42, Compilation of Air Pollutant Emission Factors; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 5) St. Louis County Construction permit CP 3038, issued July 17, 1987;
- 6) St. Louis County Construction permit CP 3039, issued July 17, 1987; and
- 7) St. Louis County Construction permit CP 6329, issued December 5, 1997;
- 8) St. Louis County Construction Permit CP 6987, Issued May 5, 2006

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

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

None

Other Air Regulations Determined Not to Apply to the Operating Permit

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

- 1) 40 CFR Part 63, Subpart JJJJ, *National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating*.
The provisions of this rule apply to each new and existing facility that is a major source of HAP, at which web coating lines are operated. The facility is an area source of HAP, therefore it is not subject to the requirements of this subpart.
- 2) 40 CFR Part 60, Subpart TT, *New Source Performance Standards for Coil Coating Operations*.
This rule is not included because the aluminum foil being coated on the Horizontal Roller-Coater is less than the 0.15 millimeter thickness specified in the Definition Section; 60.461(a) "Metal Coil Coating Operation".
- 3) St. Louis County Air Pollution Control Code, Section 612.140, *Transfer*;
St. Louis County Air Pollution Control Code, Section 612.280, *Testing by Order of the Board*; and
St. Louis County Air Pollution Control Code, Section 612.380, *Interfering with or Obstructing Division Personnel*
These rules are not included because no changes have been made at the facility that would trigger these procedural requirements.

- 4) 10 CSR 5.390, *Control of Emission from Manufacture of Paints, Varnishes, Lacquers, Enamels and other Allied Surface Coating Products*.
This regulation does not apply because the uncontrolled potential emissions of VOC from the paint blending operations are less than 100 tons per year.
- 5) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*.
The emission units at the installation do not emit particulate matter or other condensable which would reduce the transmission of light or obscure the view of an object in the background. Since the significant emission units at this installation are VOC/HAP emitting sources, we have elected not to require the permittee to conduct monitoring of opacity.

Construction Permit History

The following revisions were made to construction permits for this installation:

There were no revisions made to construction permits for this installation.

New Source Performance Standards (NSPS) Applicability

CSR 10-6.070. *New Source Performance Regulations*

- 1) 40 CFR Part 60, Subpart TT, *New Source Performance Standards for Coil Coating Operations*.
The provisions of this subpart apply to metal coil surface coating operation. As defined in §60.461(a) of this subpart, metal coil surface coating operation means the application system used to apply an organic coating to the surface of any continuous metal strip with thickness of 0.15 millimeter (mm) (0.006 in.) or more that is packaged in a roll or coil.

This rule is not included in this permit because the aluminum foil being coated on the Horizontal Roller-Coater is less than the 0.15 millimeter thickness specified in the Definition Section; 60.461(a) “Metal Coil Coating Operation”
- 2) NSPS Applicability Summary
There are no NSPS standards that are currently applicable to this installation.

Maximum Achievable Control Technology (MACT) Applicability

10 CSR 10-6.075, *Maximum Achievable Control Technology Regulations*

- 1) FOL Tape is not a major source of HAP emissions and is not subject to following subparts:
 - 40 CFR Part 63, Subpart MMMM, *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Miscellaneous Metal Parts and Products*.
This rule applies to a facility that owns or operates a miscellaneous metal parts and products surface coating operation that is a major source, or is located at a major source, or is part of a major source of HAP emissions. An affected source that uses 946 liters (250 gallons) per year, or more, of coatings that contain hazardous air pollutants (HAP) could be subject to this rule.
 - 40 CFR Part 63, Subpart PPPP, *National Emissions Standards for Hazardous Air Pollutants Surface Coating of Plastic Parts and Product*.
This subpart establishes national emission standards for hazardous air pollutants for plastic parts and products surface coating facilities that are major source of HAPs.
 - 40 CFR Part 63 Subpart DDDDD - *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters*.

The Subpart applies to a facility that owns or operates a industrial boilers, institutional boilers, commercial boilers, and process heaters that is a major source, or is located at a major source, or is part of a major source of HAP emissions. A process heater is defined as a unit in which the combustion gases do not directly come into contact with process material or gases in the combustion chamber (e.g., indirect fired). A boiler is defined as an enclosed device using controlled flame combustion and having the primary purpose of recovering thermal energy in the form of steam or hot water.

2) 40 CFR Part 63, Subpart HHHHHH - *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.*

This rule applies to area sources that engage in spray application of coatings to a plastic and/or metal substrate where the coatings contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

40 CFR Part 63, Subpart HHHHHH does not apply to this installation because it does not use coatings containing compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni) or Cadmium (Cd); does not use chemical strippers that contain methylene chloride (MeCl); and is not an auto body refinishing operation that encompass motor vehicle and mobile equipment spray-applied surface coating operations.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61 Subpart M, *National Emission Standard for Asbestos, §61.145(a), Standard for demolition and renovation, applies to the installation.*

This regulation has been included in the operating permit because it applies to any demolition or renovation (as outlined in 40 CFR 61.145) of buildings containing asbestos at the installation.

Greenhouse Gas Emissions

There are no currently issued GHG regulations applicable to this installation. Missouri regulations do not require the installation to report CO₂e emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO₂e emissions were not included within this permit.

Other Regulatory Determinations

1) Emission Units Without Limitations:

The emission units listed as units without limitations are not subject to any specific rule except the installation wide requirement of Permit Condition PW001, Voluntary Limitation(s).

2) 10 CSR 10-6.405, *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating.*

According to 10 CSR 10-6.405(1)(C), an installation is exempt from this rule if all of the installation's applicable units are fueled only by landfill gas, propane, natural gas, fuel oils #2 through #6 (with less than one and two-tenths percent (1.2 %) sulfur), or other gases (with hydrogen sulfide levels less than or equal to four (4) parts per million volume as measured using ASTM D4084, or equivalent and mercury concentrations less than forty (40) micrograms per cubic meter as measured using ASTM D5954, or ASTM D6350, or equivalent or any combination of these fuels.

All the indirect heating sources operated at this installation exclusively combust natural gas, therefore the installation is not subject to this rule.

3) 10 CSR 10-6.260, *Restriction of Emissions of Sulfur Compounds* and 10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*.

10 CSR 10-6.260 was rescinded on November 30, 2015 and replaced by 10 CSR 10-6.261; however, the provisions of 10 CSR 10-6.260 currently remain in State Implementation Plan. The provisions of 10 CSR 10-6.260 will expire, once 10 CSR 10-6.261 is incorporated into the federally-approved SIP as a final EPA action.

- All combustion equipment at the installation uses pipeline grade natural gas. Combustion equipment that uses exclusively pipeline grade natural gas as defined in 40 CFR 72.2 or liquefied petroleum gas as defined by American Society for Testing and Materials (ASTM), or any combination of these fuels is exempt from the requirements of these rules as per 10 CSR 10-6.260(1)(A)(2) and 10 CSR 10-6.261(1)(A).
- The permittee is required to comply with the record keeping requirement in 10 CSR 10-6.261(4) for SO₂ emitting sources combusting natural gas to determine the exception in 10 CSR 10-6.261(1)(A).

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

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

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

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

Response to Public Comments

The draft Intermediate Operating Permit for FOL Tape, LLC was placed on public notice as of November 01, 2019 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <http://dnr.mo.gov/env/apcp/permit-public-notice.htm> on Thursday, October 31, 2019. The Air Pollution Control Program did not receive any public comments during the 30-day comment period.