

STATE OF MISSOURI  
**DEPARTMENT OF NATURAL RESOURCES**

Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

www.dnr.mo.gov

**MAR 30 2015**

Mr. Phillip Buhler  
Gates Corporation  
1650 Rowe Parkway  
Poplar Bluff, MO 63901

Re: Gates Corporation, 023-0032  
Permit Number: **OP2014-015**

Dear Mr. Buhler:

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.

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 David Buttig at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



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

MJS/dbk

Enclosures

c: Southwest Regional Office  
PAMS File: 2012-05-099



# 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 here in.

**Intermediate Operating Permit Number:** OP2014-015  
**Expiration Date:** MAR 30 2020  
**Installation ID:** 023-0032  
**Project Number:** 2012-05-099

**Installation Name and Address**

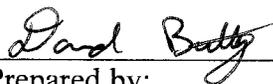
Gates Corporation  
1650 Rowe Parkway  
Poplar Bluff, MO 63901  
Butler County

**Parent Company's Name and Address**

Gates Corporation  
P.O. Box 5887  
Denver, CO 80217

**Installation Description:**

Gates Corporation in Poplar Bluff, Missouri, manufactures rubber hoses for the automobile industry. The facility does not compound rubber on site. All rubber is brought to the plant ready to use. The rubber is fed through an extruder, through cutters for sizing and then to a batch vulcanizing operation. The vulcanizer is heated by steam from a natural gas boiler. From the vulcanizing operation, the hose goes to another cutting operation, printing operation, and then to the shipping area. The facility has accepted an emission limitation of hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOC) in order to receive this Intermediate Operating Permit.



Prepared by:  
David Buttig  
Operating Permit Unit



Director or Designee  
Department of Natural Resources

**MAR 30 2015**

Effective Date

---

---

## Table of Contents

<b>I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING .....</b>	<b>3</b>
INSTALLATION DESCRIPTION .....	3
EMISSION UNITS WITH SPECIFIC LIMITATIONS .....	3
EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS .....	4
<b>II. PLANT WIDE EMISSION LIMITATIONS.....</b>	<b>5</b>
PERMIT CONDITION PW001 .....	5
10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s) .....	5
PERMIT CONDITION PW002 .....	5
10 CSR 10-6.060 .....	5
Construction Permits Required .....	5
Construction Permit #0198-030, Issued January 20, 1998.....	5
<b>III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS .....</b>	<b>6</b>
PERMIT CONDITION 001 .....	6
10 CSR 10-6.070 New Source Performance Standards .....	6
40 CFR Part 60, Subpart Dc, Standards of Performance for .....	6
Small Industrial-Commercial-Industrial Steam Generating Units .....	6
<b>IV. CORE PERMIT REQUIREMENTS .....</b>	<b>7</b>
<b>V. GENERAL PERMIT REQUIREMENTS.....</b>	<b>13</b>
<b>VI. ATTACHMENTS .....</b>	<b>17</b>
ATTACHMENT A .....	18

## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Gates Corporation in Poplar Bluff, Missouri, manufactures rubber hoses for the automobile industry. The facility does not compound rubber on site. All rubber is brought to the plant ready to use. The rubber is fed through an extruder, through cutters for sizing and then to a batch vulcanizing operation. The vulcanizer is heated by steam from a natural gas boiler. From the vulcanizing operation, the hose goes to another cutting operation, printing operation, and then to the shipping area. The facility has accepted an emission limitation of hazardous Air Pollutants (HAPs) and Volatile Organic Compounds (VOC) in order to receive this Intermediate Operating Permit.

<b>Reported Air Pollutant Emissions, tons per year</b>					
Pollutants	2013	2012	2011	2010	2009
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	0.36	0.36	0.39	0.35	0.25
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	--	--	--	--	--
Sulfur Oxides (SO <sub>x</sub> )	0.02	0.02	0.03	0.03	0.02
Nitrogen Oxides (NO <sub>x</sub> )	4.85	4.85	5.21	4.65	3.30
Volatile Organic Compounds(VOC)	23.85	23.85	16.69	7.81	5.57
Carbon Monoxide (CO)	4.08	4.08	4.38	3.91	2.77
Lead (Pb)	--	--	--	--	--
Hazardous Air Pollutants (HAPs)	3.00	3.00	2.36	2.20	2.07
Ammonia (NH <sub>3</sub> )	--	--	--	--	--

### EMISSION UNITS WITH SPECIFIC 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>EIQ Reference #</u>	<u>Description of Emission Unit</u>
EP-19	Natural Gas Boiler
EP-53	Natural Gas Boiler

**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.

Description of Emission Source

---

Extruders (6) (EP-01, 04, 32, 48, 49, and 54)

Tackifier Unit (3) (EP-03, 34, and 36)

Vulcanizers (9) (EP-10, 13, 30, 37, 38, 43, 44, 47, and 55)

Various Ink Marking Machines

Isopropyl Alcohol Finisher (EP-20)

Space Heaters (34)

## II. Plant Wide Emission Limitations

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

### PERMIT CONDITION PW001

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

#### Emission Limitation:

- 1) The permittee shall not emit more than ten (10) tons per year of any individual Hazardous Air Pollutants (HAPs).
- 2) The permittee shall not emit more than 25 tons per year of total HAPs from the entire installation in any consecutive 12-month period.
- 3) The permittee shall not emit more than 100 tons per year of VOC from the entire installation in any consecutive 12-month period

#### Monitoring/Recordkeeping:

- 1) Attachment A or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with the Emission Limitation 1 and 2 of this permit condition.
- 2) 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.

#### Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which the records indicate that the source exceeds the emissions limitations.

### PERMIT CONDITION PW002

10 CSR 10-6.060

Construction Permits Required

Construction Permit #0198-030, Issued January 20, 1998

#### Emission Limitation:

If, in the opinion of the director, a continuing situation of demonstrated nuisance odors exists for the neighbors of the facility, the director may require the Gates Rubber Company to submit a corrective action plan adequate to timely and significantly mitigate the odors. The permittee shall implement any such plan immediately upon its approval by the director. Failure to either submit or implement such a plan shall be a violation of the permit. [CP #0198-030, Special Condition 1]

### 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.

<b>PERMIT CONDITION 001</b>		
10 CSR 10-6.070 New Source Performance Standards 40 CFR Part 60, Subpart Dc, Standards of Performance for Small Industrial-Commercial-Industrial Steam Generating Units		
Emission Unit	Description	Manufacturer/Model #
EP-19	Boiler; MHDR=17.54 MMBtu/hr; Natural Gas Fired; Constructed 1982	Unknown/PFTA 600-3
EP-53	Boiler; MHDR=32.56 MMBtu/hr; Natural Gas Fired; Construction 1998	Johnson Boiler/Unknown

**Operational Limitation:**

These emission units shall be limited to burning pipeline grade natural gas.

**Monitoring/Recordkeeping:**

- 1) The permittee shall maintain records containing monthly totals of the natural gas that is combusted in this emission unit. This record shall serve as documentation that this emission unit is exclusively using pipeline grade natural gas as fuel.
- 2) All records shall be maintained onsite for a minimum of five (5) years and shall be made available to Department of Natural Resources personnel upon request.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10 CSR 10-6.065(5)(A).

## IV. Core Permit Requirements

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

### **10 CSR 10-6.045 Open Burning Requirements**

- (1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- (2) Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- (3) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the director.
- (4) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

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

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

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

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

#### **10 CSR 10-6.065 Operating Permits**

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

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

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

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

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

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

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

#### **10 CSR 10-6.150 Circumvention**

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

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

**Emission Limitation:**

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

**10 CSR 10-6.180 Measurement of Emissions of Air Contaminants**

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

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

**This requirement is not federally enforceable.**

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

**Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone**

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.

- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

<b>10 CSR 10-6.280 Compliance Monitoring Usage</b>
--

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

## V. General Permit Requirements

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

### **10 CSR 10-6.065, §(5)(E)2 and §(6)(C)1.B Permit Duration**

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

### **10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Recordkeeping and Reporting Requirements**

- 1) Recordkeeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) April 1st for monitoring which covers the January through December time period.
    - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit.
  - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

**10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)**

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

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

**10 CSR 10-6.065(5)(C)1.A General Requirements**

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

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

None

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
  - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

**10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions**

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions

limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
  - b) That the installation was being operated properly,
  - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
  - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

#### **10 CSR 10-6.065(5)(C)5 Off-Permit Changes**

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
  - b) The permittee must provide written notice of the change to the Air Pollution Control Program, Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

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

The application utilized in the preparation of this permit was signed by Phillip Buhler, Engineering Manager. On December 08, 2014 the Air Pollution Control Program was informed that Phillip Buhler is no longer the responsible official and Mr. Scott Gebhart, HSE Manager is now the responsible official. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to

be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

**10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause**

This permit may be reopened for cause if:

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

**10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis**

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

## **VI. Attachments**

Attachments follow.

**Attachment A**  
 Monthly VOC/HAPs Emission Log

Gates - Poplar Bluff, MO  
 Permit Number: P2007-061  
 Installation ID: 023-0032  
 Period Covered:

<i>January 2013 (Example)</i>								
Process Name	Units	Usage (units/month)	Conversion	Usage (monthly)	VOCs (total)		HAPs (Total VOC and non-VOC)	
					RMA Emissn Factor	Emissions (lbs VOC)	RMA Emissn Factor	Emissions (lbs VOC)
<b>Extruders (6)</b> <b>EP 01, 04, 32, 48, 49, 54</b>				(tons)	(lbs VOC/ton)		(lbs VOC/ton)	
Rubber Slab	Pounds	363,958		182.0	0.04935	9	0.04265	8
<b>Tackifier Units (3)</b> <b>EP 03, 34, 36</b>			(lbs/gal)	(lbs)	19.2% released (lbs/year)			
Kerosene	Gallons	1,314	6.847	8,993.5	19.2%	1,727	2.5	43
<b>Vulcanizers (9)</b> <b>EP 10, 13, 30, 37, 38, 43, 44, 47, 55</b>				(tons)				
Rubber Hose	Pounds	363,958		182.0	0.5345	97	1.6592	302
<b>Finishing EP 20</b>			(gal/qt)	(gallons)				
Isopropyl Alcohol	32 oz Btl	1,800	4.0	450.0	6.56	2,952	0.0000	0.00
<b>Boilers (2) EP 19, 53</b>				(MMCF)				
Natural Gas	Therms	83,458.8		8.14	5.5	44.78		
<b>Space Heaters (34) EP 29</b>								
Natural Gas	Therms	14,822.2		1.45	5.5	7.95		
(Building heat is 10-15%)								
<b>Total Pounds:</b>						<b>4,838</b>		<b>353</b>
<b>Total Tons:</b>						<b>2.42</b>		<b>0.18</b>

Note: HAPs Total will always be higher than all HAPs added together since the HAPS total number includes several minor HAPs not listed.

\*Emission factors are based on factors produced by the Rubber Manufacturers' Association.

Gates - Poplar Bluff, MO  
 Permit Number: P2007-061  
 Installation ID: 023-0032  
 Period Covered:

January 2013 (Example)  Process Name	HAPs (non-VOC)									
	Carbon Disulfide 75-15-0 (non-VOC)		Methylene Chloride 75-09-2 (non-VOC)		Carbonyl Sulfide 463-58-1 (non-VOC)		Acetophenone 98-86-2 (non-VOC)		Acrylonitrile 107-13-1 (non-VOC)	
	lbs/ton	Emissions (lbs)	lbs/ton	Emissions (lbs)	lbs/ton	Emissions (lbs)	lbs/ton	Emissions (lbs)	lbs/ton	Emissions (lbs)
<b>Extruders (6) EP 01, 04, 32, 48, 49, 54</b>										
Rubber Slab	0.0106	1.93	0.00508	0.92	0.0027	0.49	0.0012	0.21	0.0006	0.11
<b>Tackifier Units (3) EP 03, 34, 36</b>										
Kerosene										
<b>Vulcanizers (9) EP 10, 13, 30, 37, 38, 43, 44, 47, 55</b>										
Rubber Hose	0.9128	166.13	0.1237	22.52	0.0536	9.76	0.0426	7.75	0.0187	3.40
<b>Finishing EP 20</b>										
Isopropyl Alcohol										
<b>Boilers (2) EP 19, 53</b>										
Natural Gas										
<b>Space Heaters (34) EP 29</b>										
Natural Gas										
(Building heat is 10-15%)										
<b>Total Pounds:</b>		<b>168</b>		<b>23</b>		<b>10</b>		<b>8</b>		<b>4</b>
<b>Total Tons:</b>										

\*Emission factors are based on factors produced by the Rubber Manufacturers' Association.

Gates - Poplar Bluff, MO  
 Permit Number: P2007-061  
 Installation ID: 023-0032  
 Period Covered:

Process Name	HAPs (VOC)											
	Hexane 110-54-3		Naphthalene 91-20-3		Xylenes 1330-20-7		Toluene 108-88-3		4-methyl-2- Pentanone (MIBK) 108-10-1		Ethylbenzene 100-41-4	
	lbs/ton	Emissions (lbs)	lbs/ton	Emissions (lbs)	lbs/ton	Emissions (lbs)	lbs/ton	Emissions (lbs)	lbs/ton	Emissions (lbs)	lbs/ton	Emissions (lbs)
<b>January 2013 (Example)</b>												
<b>Extruders (6) EP 01, 04, 32, 48, 49, 54</b>												
Rubber Slab	0.00739	1.34			0.00172	0.31	0.0030	0.54			0.0003	0.06
<b>Tackifier Units (3) EP 03, 34, 36</b>			% by wt		% by wt							
Kerosene			1.5	25.90	1.0	17.27						
<b>Vulcanizers (9) EP 10, 13, 30, 37, 38, 43, 44, 47, 55</b>												
Rubber Hose	0.2109	38.38			0.0697	12.69	0.06542	11.91	0.0101	1.84	0.0033	0.60
<b>Finishing EP 20</b>												
Isopropyl Alcohol												
<b>Boilers (2) EP 19, 53</b>												
Natural Gas												
<b>Space Heaters (34) EP 29</b>												
Natural Gas												
(Building heat is 10-15%)												
<b>Total Pounds:</b>		<b>40</b>		<b>26</b>		<b>30</b>		<b>12</b>		<b>2</b>		<b>1</b>
<b>Total Tons:</b>												

\*Emission factors are based on factors produced by the Rubber Manufacturers' Association.

**12 Month Rolling Total**

Gates - Poplar Bluff  
 Permit # OP2007-061

	Total VOCs (lbs/month)	Tons during previous 12 months	Total HAPs (lbs/month)	Tons during previous 12 months	Largest Single HAP (Carbon Disulfide) (lbs/month)	Tons during previous 12 months	Largest Single HAP (Hexane) (lbs/month)	Tons during previous 12 months
<b>Permit Limits</b>		<b>100.0</b>		<b>25</b>		<b>10</b>		<b>10</b>
Actual								
January 2013	4,838	2.42	353	0.18	168	0.08	40	0.02
February 2013	3,500	4.17	396	0.37	194	0.18	46	0.04
March 2013	3,314	5.83	300	0.52	135	0.25	32	0.06
April 2013	2,661	7.16	338	0.69	165	0.33	39	0.08
May 2013	3,439	8.88	348	0.87	160	0.41	38	0.10
June 2013	2,088	9.92	365	1.05	172	0.50	41	0.12
July 2013	3,290	11.57	565	1.33	281	0.64	66	0.15
August 2013	3,670	13.40	588	1.63	289	0.78	68	0.19
September 2013	3,288	15.04	637	1.95	320	0.94	76	0.22
October 2013	4,261	17.17	718	2.30	351	1.12	83	0.26
November 2013	3,081	18.72	724	2.67	363	1.30	86	0.31
December 2013	3,511	20.47	918	3.13	463	1.53	109	0.36

# STATEMENT OF BASIS

## Voluntary Limitations

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

## Permit Reference Documents

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

- 1) Intermediate Operating Permit Application, received May 25, 2012;
- 2) 2013 Emissions Inventory Questionnaire, received March 31, 2014; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

## Emission Point Changes

The following emission points have been removed from service with no intent for return to service. The APCP was informed of these changes by e-mail from Ron Fleming:

Emission Point	Description
EP-11	12' Vulcanizer (All Rubber)
EP-12	54" Kettle Vulcanizer (AOE)
EP-33	2.5" Extruder (SID)
EP-50	Tackifier (in-line)

## 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.

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

Per 10 CSR 10-6.100(1)(A), "this rule applies to installations that emit volatile organic compounds (VOC) in the ozone nonattainment areas of the state".

Therefore, since this installation is in an ozone attainment area, this rule is not applicable.

*10 CSR 10-6.260, Restriction of Emissions of Sulfur Compounds*

Per 10 CSR 10-6.260(1)(A)2, “this rule applies to any installation that is an emission source of sulfur compounds, except 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”.

Therefore, since pipeline grade natural gas is the only fuel used in combustion equipment, this rule does not apply.

*10 CSR 10-6.360, Control of NOx Emissions from Electric Generating Units and Non-Electric Generating Boilers*

10 CSR 10-6.360 only applies to boilers larger than 250 MMBtu per 10 CSR 10-6.360(1)(B)2

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

*10 CSR 10-6.400(1)(B)6* states that the provisions of the rule shall not apply to the burning of fuel for indirect heating.

Therefore, this rule does not apply for the boilers or space heaters since they are indirect heating sources.

*10 CSR 10-6.405, Restriction of Particulate Matter Emissions from Fuel Burning Equipment Used for Indirect Heating*

An installation is exempt from this rule if all of the installation’s applicable units are fueled only by natural gas per 10 CSR 10-6.405(1)(E).

**Construction Permit Revisions**

Construction Permit History	
Permit Number	Project Description
0483-012	Hose manufacturing installation
0594-030	72” vertical vulcanizer
1195-008	Extruder, vulcanizer, and tackifier
0198-030	Installation of three (3) 72” kettle vulcanizers, one (1) 7’ by 8’ horizontal vulcanizers, two (2) extruders, one (1) tackifier, two (2) layline printers, and one (1) boiler

No revisions were made to the construction permits issued to this facility. Construction Permit 0198-030 Special Condition is in Plantwide Permit Condition 2, and the remaining construction permits listed above did not contain Special Conditions.

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

40 CFR Part 60, Subpart Dc, *Standards of Performance for small Industrial-Commercial-Institutional Steam Generating Units*, this subpart applies to EP-19 and EP-53, the natural gas fired boilers.

**Maximum Achievable Control Technology (MACT) Applicability**

None

**Updated Potential to Emit for the Installation**

Pollutant	Potential to Emit (tons/yr) <sup>1</sup>
CO	17.98
HAP (Total)	< 25
HAP (Individual)	< 10
NO <sub>x</sub>	23.01
PM <sub>10</sub>	1.77
SO <sub>x</sub>	0.138
VOC	< 100

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

**Other Regulatory Determinations**

None

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

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

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

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

## MEMORANDUM

DATE: February 19, 2014

TO: 2012-05-099, The Gates Corporation – Poplar Bluff (023-0032)

FROM: David Buttig, Operating Permits Unit

SUBJECT: Response to Public Comments

A draft of the Gates Corporation – Poplar Bluff Intermediate Operating Permit was placed on public notice on January 15, 2014, by the Missouri Department of Natural Resources (MDNR). Comments were received on February 03, 2014 from Robert Cheever, Environmental Engineer in the Air Permitting and Compliance Branch of the Environmental Protection Agency Region 7. The one (1) comment is presented below as submitted, with the response to the comment by the Air Pollution Control Program (APCP) directly following.

### **EPA Comment #1:**

Plant wide permit conditions PW001 establishes an annual emission limit for HAPs and any individual HAP in any consecutive 12-month period. First, there is no reference in this permit condition emission limitation as to what emission unit(s) is (are) subject to the consecutive 12-month limitation. Section I: Installation Description and Equipment Listing indicates the emission units with limitations are EP-19 and EP-53; both natural gas fired boilers. Natural gas fired boilers, as a rule, do not discharge hazardous air pollutants (HAPs) in quantities that might warrant a 10/25 ton per year voluntary limit. Therefore, it would appear that there are other emission units which are subject to emission limitations and should be listed. However, if the two (2) natural gas fired boilers are truly the only emission units with limitations, EPA questions the need for an intermediate state operating permit.

Next, plant wide permit conditions PW001 appears to set these emission limitations at a level such that the Gates Corporation – Poplar Bluff potential to emit is below the major source level required for a Part 70 (Title V) operating permit. However, these voluntary limits, as written are not practically enforceable, the potential to emit (PTE) limits to, avoid becoming a major source for operating permit purposes, should impose practically enforceable production or operational limits in addition to the practically enforceable emission limits. This permit condition includes

HAP emission limits based on a ‘not to exceed value in any consecutive 12-month period.’ However, the permit condition does not include any corresponding production or operation “not to exceed value in any consecutive 12-month period.”

It would appear, although not indicated or stated, that the HAP limits apply to the usage of materials in one or more of the emission units without limitations. If that is the case, then permit condition PW001 should indicate either the amount of HAP containing material consumed and or used in any consecutive 12- month period, rolled monthly; or the maximum amount of rubber hose produced (where the HAP generating materials is being used) in any consecutive 12-month period, rolled monthly should be included in permit condition PW001. Therefore, EPA preferably recommends MDNR consider using a practically enforceable material consumption or rubber hose production as an additional plant wide permit condition PW001 emission limitation.

**Missouri Air Pollution Control Program Response to EPA Comment #1:**

The permit has been changed to have the heading, “EMISSION UNITS WITH SPECIFIC LIMITATIONS” and “EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS” from the original format of “EMISSION UNITS WITH LIMITATIONS” and “EMISSION UNITS WITHOUT LIMITATIONS”. This change clarifies which emission units at the facility have unit specific limitations verses plant-wide limitations.

All emission units listed in the permit under “EMISSION UNITS WITH SPECIFIC LIMITATIONS” and “EMMISION UNITS WITHOUT SPECIFIC LIMITATIONS” are subject to the plant wide limitations listed in the permit and are therefore subject to the 10/25 tpy HAP limitation listed as Permit Condition PW001.

It is the practice of the Program to use emission limitations rather than production limitations in order to set limit on facilities. This method provides the most flexibility an achieving compliance with the limit while also allowing for changes in emission factors. For this reason, no additional production or consumption limits have been added to the permit.

DB/kjc