



## PART 70 PERMIT TO OPERATE

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

**Operating Permit Number:** OP2013-064  
**Expiration Date:** NOV 13 2018  
**Installation ID:** 201-0021  
**Project Number:** 2012-05-110

**Installation Name and Address**

Havco Wood Products, Inc.  
3200 East Outer Road  
Scott City, MO 63780  
Scott County

**Parent Company's Name and Address**

Havco Wood Products, Inc.  
P.O. Box 1342  
Cape Girardeau, MO 63702-1342

**Installation Description:**

The permittee is a manufacturer of wood flooring for tractor-trailer beds in Scott City, Missouri. This facility is considered a Part 70 Installation due to emissions of carbon monoxide (CO), particulate matter less than ten microns in diameter (PM<sub>10</sub>) and volatile organic compounds (VOC).

NOV 14 2013

\_\_\_\_\_  
Effective Date

  
\_\_\_\_\_  
Director or Designee  
Department of Natural Resources

## Table of Contents

<b>I. INSTALLATION DESCRIPTION AND EQUIPMENT LISTING .....</b>	<b>4</b>
INSTALLATION DESCRIPTION .....	4
EMISSION UNITS WITH LIMITATIONS .....	4
EMISSION UNITS WITHOUT LIMITATIONS .....	5
DOCUMENTS INCORPORATED BY REFERENCE .....	5
<b>II. PLANT WIDE EMISSION LIMITATIONS.....</b>	<b>6</b>
<b>III. EMISSION UNIT SPECIFIC EMISSION LIMITATIONS .....</b>	<b>7</b>
VISIBLE EMISSION SOURCES .....	7
All sources of visible emissions .....	7
Permit Condition 1 .....	7
Visible Emission Sources 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants .....	7
BOILERS.....	7
EU0020.....	7
EU0030.....	8
Permit Condition 1 .....	8
EU0020 10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60 Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.....	8
Permit Condition 2 .....	8
EU0020, EU0030 10 CSR 10-6.060 Construction Permits Required Permit Nos. 1194-009 & 1097-020 .....	8
Permit Condition 3 .....	8
EU0020, EU0030 10 CSR 10-6.405 Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating.....	8
Permit Condition 4 .....	9
EU0030 10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds .....	9
Permit Condition 5 .....	9
EU0020, EU0030 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart JJJJJ— National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources ....	9
CONTROL DEVICE MONITORING GROUP.....	11
EU0060.....	11
EU0070.....	11
EU0120.....	11
EU0150.....	11
Permit Condition 1 .....	11
EU0060, EU0120, EU0070 & EU0150 10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes 10 CSR 10-6.060 Construction Permits Required - Permit No. 022000-003 .....	11
GLUE HANDLING .....	12
EU0080.....	12
Permit Condition 1 .....	12
EU0080 10 CSR 10-6.060 Construction Permits Required, Construction Permits No. 022000-003 and 022013-002 .....	12
<b>IV. CORE PERMIT REQUIREMENTS .....</b>	<b>13</b>
<b>V. GENERAL PERMIT REQUIREMENTS.....</b>	<b>21</b>
<b>VI. ATTACHMENTS .....</b>	<b>26</b>
ATTACHMENT A .....	27
Fugitive Emission Observations .....	27
ATTACHMENT B .....	28
Opacity Emission Observations .....	28
ATTACHMENT C .....	29

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Method 9 Opacity Emissions Observations .....	29
ATTACHMENT D .....	30
Inspection/Maintenance/Repair/Malfunction Log.....	30
ATTACHMENT E .....	31
Alternative Adhesives Potential to Emit Compliance Worksheet .....	31

## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Havco Wood Products, Inc. (Havco) produces wood flooring for tractor-trailer beds at their installation at 3200 East Outer Road in Scott City, Missouri. The processes includes planing, sawing, sanding and gluing wood.

The reported actual emissions for the past five years for the installation are listed below:

<b>Reported Air Pollutant Emissions, tons per year</b>					
Pollutants	2011	2010	2009	2008	2007
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	34.7	20.6	16.1	39.4	47.1
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )	7.0	3.9	2.7	8.2	9.5
Sulfur Oxides (SO <sub>x</sub> )	3.0	1.8	0.7	2.4	3.0
Nitrogen Oxides (NO <sub>x</sub> )	26.6	15.6	5.9	21.3	26.8
Volatile Organic Compounds(VOC)	2.0	1.2	0.4	1.6	2.0
Carbon Monoxide (CO)	72.6	42.6	16.1	58.0	73.1
Lead (Pb)	-- <sup>1</sup>	--	--	--	--
Hazardous Air Pollutants (HAPs) <sup>2</sup>	--	--	--	--	--
Ammonia (NH <sub>3</sub> )	--	--	--	--	--

### EMISSION UNITS WITH LIMITATIONS

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

<b>Emission Unit #</b>	<b>Description of Emission Unit</b>
EU0020	Hurst Boiler – Sawdust Fired
EU0030	IBC Boiler – Sawdust Fired
EU0060	Saw Dust Recovery System
EU0070	Glue Handling and Mixing
EU0080	Glue Handling
EU0100	Sawdust Storage Silos

<sup>1</sup> "--" indicates that either the amount emitted is below the reporting threshold or that nothing was reported.

<sup>2</sup> HAPs may be reported as VOC or PM<sub>10</sub>, if the chemical pollutant qualifies.

<b>Emission Unit #</b>	<b>Description of Emission Unit</b>
EU0120	Sanding Operation
EU0150	Edge Trimmer

**EMISSION UNITS WITHOUT LIMITATIONS**

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

<b>Emission Unit #</b>	<b>Description of Emission Unit</b>
EU0010	Head Planer
EU0010A	Clamshell Sawdust Bin
EP-08	Diesel Fuel No. 2 Storage Tank
EP-09	Gasoline Storage Tank
EP-10	Saw Dust Truck Loading (fugitive)
EP-11	Kerosene Storage Tank
EP-12	Wood Putty
EP-14	Haul Roads
EP-15	Kerosene Space Heaters
EP-16	Sawdust Pile
	Abrasive Sanders
	Defect Saws
	Panel Rip Saws
	Panel Crosscut Saws
	Dust Hog
EP-20	Undercoating Spray
EP-21	Wood Putty
EU0130	Roller Coater – Wood
EU0140	Roller Coater – FRP
EU0180	FRP Crosscut Saw

**DOCUMENTS INCORPORATED BY REFERENCE**

These documents have been incorporated by reference into this permit.

- 1) Construction Permit No. 1194-009, Issued November 1, 1994;
- 2) Construction Permit No. 1097-020, Issued October 8, 1997;
- 3) Construction Permit No. 022000-003, Issued January 31, 2000
- 4) Construction Permit No. 022013-002, Issued February 14, 2013

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## II. Plant Wide Emission Limitations

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

The following requirements apply to *all conditions* in this permit, unless otherwise noted.

### **Monitoring:**

The permittee shall calibrate, maintain and operate all instruments and control equipment according to the manufacturer's recommendations or according to good engineering practices.

### **Recordkeeping:**

The permittee shall record all required recordkeeping (i.e. inspections and corrective actions) in an appropriate format. Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations. The permittee's written inspection procedures will be made available to department personnel upon request.

### **Reporting<sup>3</sup>:**

- 1) The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten (10) days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition), to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102
- 2) The permittee shall submit an annual certification<sup>4</sup> 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. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. These certifications shall be submitted annually by **April 1<sup>st</sup>**, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to Environmental Protection Agency, Region VII, AWMD/APCO, 11201 Renner Boulevard, Lenexa, KS 66219, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.

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<sup>3</sup> Refer to General Permit Requirements, 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, page 22, for additional details, including semi-annual reporting of monitoring data.

<sup>4</sup> Refer to General Permit Requirements, 10 CSR 10-6.065(6)(C)3 Compliance Requirements, page 24, for more details.

### III. Emission Unit Specific Emission Limitations

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

Visible Emission Sources
Description
All sources of visible emissions

Permit Condition 1
Visible Emission Sources
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

**Emission Limitations:**

The permittee shall not discharge into the ambient air from any source, not exempted under 10 CSR 10-6.220, any air contaminant of opacity greater than twenty (20%) percent. A source with a 20% opacity limit may emit air contaminants with opacity over 20%, but not greater than 40% for an aggregate length of time not to exceed six (6) minutes in any 60 minutes. Where the presence of uncombined water is the only reason for failure of an emission to meet the opacity requirements, the opacity requirements shall not apply.

**Monitoring / Recordkeeping:**

The permittee will follow the monitoring and recordkeeping requirements listed in Core Permit Requirements for 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants, starting on page 18.

Boilers			
Emission Unit	Equipment Number	Description	Control Devices
EU0020		Hurst Boiler – Saw dust fired 29.1 MMBtu per hour with multiple cyclones, Hurst Boiler & Welding Company, Inc. (Advanced Engineered Systems -S382), Constructed 1994 (2002 Changed firebox to Hurst)	

<b>Boilers</b>			
Emission Unit	Equipment Number	Description	Control Devices
EU0030		IBC Boiler – Saw dust fired 23.4 MMBtu per hour with multiple cyclones, Industrial Boiler Company, Constructed 1986	

**Permit Condition 1**  
EU0020  
10 CSR 10-6.070 New Source Performance Regulations  
40 CFR Part 60 Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

**Recordkeeping:**

The permittee shall record and maintain records of the amounts of each fuel combusted during each day. [40 CFR 60.48c(g)(1)]

**Permit Condition 2**  
EU0020, EU0030  
10 CSR 10-6.060 Construction Permits Required  
Permit Nos. 1194-009 & 1097-020

**Emission Limitation:**

- 1) The permittee shall maintain and operate the multiple cyclone systems on EU0020 and EU0030 whenever they are operating.
- 2) Only wood waste generated at this facility shall be burned in this boiler.

**Recordkeeping:**

The permittee shall maintain an operating and maintenance log for the cyclone systems. The permittee shall use the form Attachment D, “Inspection/Maintenance/Repair/Malfunction Log”, found on page 30, or its equivalent. The log shall include the following information:

- 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
- 2) Maintenance activities, with inspection schedule, repair actions, and replacements.

**Permit Condition 3**  
EU0020, EU0030  
10 CSR 10-6.405 Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating

**Emission Limitation<sup>5</sup>:**

The permittee shall not emit particulate matter in excess of 0.24 pounds per million Btu of heat input from either EU0020 or EU0030.

<sup>5</sup> See the statement of basis for further details.

**Permit Condition 4**  
 EU0030  
 10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

**Emission Limitation<sup>6</sup>:**

The permittee shall not cause or allow emissions of sulfur dioxide into the atmosphere from any indirect heating source in excess of eight (8) pounds of sulfur dioxide per million Btus actual heat input averaged on any consecutive three (3) hour time period.

**Permit Condition 5**  
 EU0020, EU0030  
 10 CSR 10-6.075 Maximum Achievable Control Technology Regulations  
 40 CFR Part 63, Subpart JJJJJ—National Emission Standards for Hazardous Air Pollutants for  
 Industrial, Commercial, and Institutional Boilers Area Sources

**Emission Limitation:**

- 1) The permittee shall conduct a tune-up of EU0020 and EU0030 biennially. [§ 63.11223, Existing biomass]
- 2) The permittee shall have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table satisfies the energy assessment requirement. The energy assessment must include [Existing biomass (units with heat input capacity of 10 million Btu per hour and greater)]:
  - a) A visual inspection of the boiler system,
  - b) An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints,
  - c) Inventory of major systems consuming energy from affected boiler(s),
  - d) A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,
  - e) A list of major energy conservation measures,
  - f) A list of the energy savings potential of the energy conservation measures identified,
  - g) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
- 3) The permittee shall comply with all the provisions identified below (§ 63.11225, Table 8).

General provisions cite	Subject	Does it apply?
§ 63.1	Applicability	Yes.
§ 63.2	Definitions	Yes. Additional terms defined in § 63.11237.
§ 63.3	Units and Abbreviations	Yes.
§ 63.4	Prohibited Activities and Circumvention	Yes.

<sup>6</sup> See the statement of basis for further details.

General provisions cite	Subject	Does it apply?
§ 63.6(a), (b)(1)-(b)(5), (b)(7), (c), (f)(2)-(3), (g), (i), (j)	Compliance with Standards and Maintenance Requirements	Yes.
§ 63.6(h)(2) to (9)	Determining compliance with opacity emission standards	Yes.
§ 63.7(a), (b), (c), (d), (e)(2)-(e)(9), (f), (g), and (h)	Performance Testing Requirements	Yes.
§ 63.8(a), (b), (c)(1), (c)(1)(ii), (c)(2) to (c)(9), (d)(1) and (d)(2), (e),(f), and (g)	Monitoring Requirements	Yes.
§ 63.8(d)(3)	Written procedures for CMS	Yes, except for the last sentence, which refers to an SSM plan. SSM plans are not required.
§ 63.9	Notification Requirements	Yes, excluding the information required in § 63.9(h)(2)(i)(B), (D), (E) and (F). See § 63.11225.
§ 63.10(a) and (b)(1)	Recordkeeping and Reporting Requirements	Yes.
§ 63.10(b)(2)(iii)	Maintenance records	Yes.
§ 63.10(b)(2)(vi)	Recordkeeping for CMS malfunctions	Yes.
§ 63.10(b)(2)(vii) to (xiv)	Other CMS requirements	Yes.
§ 63.10(c)(1) to (9)	Recordkeeping for sources with CMS	Yes.
§ 63.10(c)(12) and (13)	Recordkeeping for sources with CMS	Yes.
§ 63.10(d)(1) and (2)	General reporting requirements	Yes.
§ 63.10(d)(4)	Progress reports under an extension of compliance	Yes.
§ 63.10(e)	Additional reporting requirements for sources with CMS	Yes.
§ 63.10(f)	Waiver of recordkeeping or reporting requirements	Yes.
§ 63.12	State Authority and Delegation	Yes.
§ 63.13-63.16	Addresses, Incorporation by Reference, Availability of Information, Performance Track Provisions	Yes.

<b>Control Device Monitoring Group</b>		
Emission Unit	Description	Control Devices
EU0060	Lines 2 & 3 Sawdust Recovery System [(Gang Rip Saws, Mereen Johnson, 424DC; Abrasive Sanders, Timesavor, TBO30; Choppers; Defect Saws, Precision Products, 141M-HJ; Panel Rip Saws, Rosenquist Inc., Custom; Panel Crosscut Saws, HendricK, HS-78; Dust Hog, Montgomery, 66—PM; All Constructed 2000); Autosaws; Endmatcher]	C017, Fabric Filter
EU0070	Glue handling and mixing exhaust system, Advanced Engineering Systems, S382, Constructed 2000	C018, fabric filter
EU0120	Sanding Operation, Constructed 2000, Timesavers Inc. / 325-2ATF	C017, Fabric Filter
EU0150	Edge Trimmer, Constructed 1984, Kupper Muhle / 10307	C027, Fabric Filter

**Permit Condition 1**  
 EU0060, EU0120, EU0070 & EU0150  
 10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes<sup>7</sup>  
 10 CSR 10-6.060 Construction Permits Required - Permit No. 022000-003

**Emission Limitation:**

- 1) The permittee shall control emissions from EU0060, EU0120, EU0070 and EU0150 using C017, C018 and C027, respectively.
- 2) The permittee shall operate the control devices at all times the emission units, or any part of the emission units, is in operation. [Permit 022000-003, Special Condition 3]
- 3) The permittee shall equip each control device with a gauge or meter that indicates the pressure drop. The permittee shall ensure that the gauge or meter is observable by the Department of Natural Resources' employees.
- 4) The permittee shall keep replacement bags for the control devices on hand at all times. The permittee shall ensure that the bags are made of fibers appropriate for the operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).

**Monitoring/Recordkeeping**

- 1) The permittee shall monitor and record the operating pressure drop across the control devices at least once every twenty-four hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Permit 022000-003, Special Condition 4]
- 2) The permittee shall maintain an operating and maintenance log for the control devices. [Permit 022000-003, Special Condition 5] The permittee shall use the form Attachment D,

<sup>7</sup> The exemption from state rule 10 CSR 10-6.400 is contingent on the permittee maintaining and operating the control device as specified in the permit condition.

“Inspection/Maintenance/Repair/Malfunction Log”, found on page 30, or its equivalent. The log shall include the following information:

- a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
- b) Maintenance activities, with inspection schedule, repair actions, and replacements.

<b>Glue Handling</b>			
Emission Unit	Equipment Number	Description	Control Devices
EU0080		Glue handling, Black Brothers Inc., 22D-650, Constructed 2000	C019, wet scrubbing system

**Permit Condition 1**  
 EU0080  
 10 CSR 10-6.060 Construction Permits Required,  
 Construction Permits No. 022000-003 and 022013-002

**Emission Limitation:**

- 1) The permittee shall control formaldehyde emissions from the *Glue Handling* using C019.
- 2) The permittee shall operate C019 at all times that the *Glue Handling* process is in operation.
- 3) The permittee shall equip C019 with a gauge or meter which indicates the water flowrate to the scrubber. This gauge or meter shall be easily observed by the Department of Natural Resources' employees. [Permit 022000-003, Special Condition 1]
- 4) Use of Alternative Adhesives in the Glue Handling [Permit 022013-002, Special Condition 1]
  - a) When considering using an alternative material in the glue handling (EU0080) that is different than *Momentive 4720H*, the permittee shall calculate the potential emissions of each individual HAP and total VOC in the alternative material.
  - b) The permittee shall apply for and receive approval from the permitting authority before using the alternative material, if the potential to emit an individual HAP for the alternative material are equal to or greater than the screening model action level (SMAL) for any chemical listed in Table of Hazardous Air Pollutants and Screening Model Action Levels [<http://www.dnr.mo.gov/env/apcp/docs/cp-hapsmaltbl6.pdf>] or if the potential to emit VOCs exceed 14.72 tons per year.

**Monitoring/Recordkeeping**

- 1) The permittee shall monitor and record the water flowrate to C019 at least once every twenty-four hours. The water flowrate shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Permit 022000-003, Special Condition 2]
- 2) The permittee shall use Attachment F, “Alternative Adhesives Potential to Emit Compliance Worksheet”, found on page 31, or an equivalent form, such as electronic forms, approved by the Air Pollution Control Program.

## IV. Core Permit Requirements

The installation shall comply with each of the following regulations or codes. Consult the appropriate sections in the Code of Federal Regulations (CFR), the Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following 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) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
  - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
    - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
    - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
    - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
    - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;
  - b) Yard waste, with the following exceptions:
    - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
    - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
    - iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
      - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
      - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
      - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
      - (4) In each instance, the twenty-one (21)-day burning period shall be determined by the director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the department director; and

- iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) 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.
- 4) Havco Wood Products, Inc. may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Havco Wood Products, Inc. fails to comply with the provisions or any condition of the open burning permit.
- a) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or 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.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

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

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

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

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

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

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(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(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 pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 6) 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.
- 7) 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.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

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

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

**10 CSR 10-6.170**

**Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin**

**Emission Limitation:**

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

**Monitoring:**

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

The permittee shall maintain the following monitoring schedule:

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

**Recordkeeping:**

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

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

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

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

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

**This requirement is not federally enforceable.**

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

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

**Emission Limitation:**

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

**Monitoring:**

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

**Recordkeeping:**

The permittee shall maintain records of all observation results using appropriately Attachments B or C (or their equivalent), noting:

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

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

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

used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

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

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

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

## V. General Permit Requirements

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

### **10 CSR 10-6.065(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(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) October 1st for monitoring which covers the January through June time period, and
    - ii) April 1st for monitoring which covers the July through December time period.
    - iii) Exception. Monitoring requirements which require reporting more frequently than semi-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, this includes deviations or Part 64 exceedances.
  - 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.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's semi-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(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(6)(C)1.F Severability Clause**

In the event of a successful challenge to any part of this permit, all uncontested permit conditions shall continue to be in force. All terms and conditions of this permit remain in effect pending any administrative or judicial challenge to any portion of the permit. If any provision of this permit is invalidated, the permittee shall comply with all other provisions of the permit.

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

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to

the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted pursuant to 10 CSR 10-6.065(6)(C)1.

#### **10 CSR 10-6.065(6)(C)1.H Incentive Programs Not Requiring Permit Revisions**

No permit revision will be required for any installation changes made under any approved economic incentive, marketable permit, emissions trading, or other similar programs or processes provided for in this permit.

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted 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 EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and

- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

#### **10 CSR 10-6.065(6)(C)6 Permit Shield**

- 1) Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as of the date that this permit is issued, provided that:
  - a) The applicable requirements are included and specifically identified in this permit, or
  - b) The permitting authority, in acting on the permit revision or permit application, determines in writing that other requirements, as specifically identified in the permit, are not applicable to the installation, and this permit expressly includes that determination or a concise summary of it.
- 2) Be aware that there are exceptions to this permit protection. The permit shield does not affect the following:
  - a) The provisions of Section 303 of the Act or Section 643.090, RSMo concerning emergency orders,
  - b) Liability for any violation of an applicable requirement which occurred prior to, or was existing at, the time of permit issuance,
  - c) The applicable requirements of the acid rain program,
  - d) The authority of the Environmental Protection Agency and the Air Pollution Control Program of the Missouri Department of Natural Resources to obtain information, or
  - e) Any other permit or extra-permit provisions, terms or conditions expressly excluded from the permit shield provisions.

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

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
  - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
  - b) That the installation was being operated properly,
  - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
  - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS

66219, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under Section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), recordkeeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days' notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
  - d) The permit shield shall not apply to these changes.

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

The current responsible official for Havco Wood Products, Inc. is Charles Bradford, Vice President of Operations. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

### **10 CSR 10-6.065(6)(E)6 Reopening-Permit for Cause**

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) receives notice from the Environmental Protection Agency (EPA) that a petition for disapproval of a permit pursuant to 40 CFR § 70.8(d) has been granted, provided that the reopening may be stayed pending judicial review of that determination,
- 2) The Missouri Department of Natural Resources or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 3) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
  - a) The permit has a remaining term of less than three years;
  - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
  - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 4) The installation is an affected source under the acid rain program and additional requirements (including excess emissions requirements), become applicable to that source, provided that, upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the permit; or
- 5) 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(6)(E)1.C Statement of Basis**

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

## **VI. Attachments**

Attachments follow.





**Attachment C**

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

Readings ranged from \_\_\_\_\_ to \_\_\_\_\_ % opacity.

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



**Attachment E**  
 Alternative Adhesives Potential to Emit Compliance Worksheet  
 (from Permit 022013-002: Attachment A)

Column 1	Column 2 (a)	Column 3	Column 4 (b)	Column 5	Column 6 (f)	Column 7 (c)
Material Name	Maximum Hourly Design Rate (pounds per hour)	Individual HAP Content (weight %)	Individual HAP PTE (tons per year)	VOC (weight %)	VOC (ton per year) for the Material	Screen Modeling Action Level (tons per year)
<i>(example) new adhesive</i>	240	3.0%	11.03	5.0%	18.40	1.0

- a) Note: The maximum hourly design rate is equal to 240 pounds per hour.
- b)  $[\text{Column 2}] \times [\text{Column 3}] \times [4.38] \times [0.35] / 100 = [\text{Column 4}]$
- c) Screen Modeling Action Levels for individual HAPs can be found in Appendix B.
- d) Compare potential emissions of the individual HAP in [Column 4] to those from [Column 7]
- e) If [Column 4] is greater than [Column 7], then you must submit an applicability determination to the Air Pollution Control Program.
- f)  $[\text{Column 2}] \times [\text{Column 5}] \times [4.38] \times [0.35] / 100 = [\text{Column 6}]$
- g) If [Column 6] is greater than 14.72, then you must submit an applicability determination to the Air Pollution Control Program.

## STATEMENT OF BASIS

### Permit Reference Documents

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

- 1) Part 70 Operating Permit Application, received May 30, 2012;
- 2) Five (5) most recent years (2011 through 2007) of MoEIS (Emissions Inventory Questionnaire) data;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) U.S. EPA document - Factor Information Retrieval (FIRE) Data System, Version 6.21;
- 5) Construction Permit No. 1186-005A, Issued October 21, 1986;
- 6) Construction Permit No. 022001-012; and
- 7) Construction Permit No. 062007-006.
- 8) Construction Permit No. 022013-002.

### Project History

Project #	Permit #	Received Date	Completed Date	NRCPMT_DESCRIPTION
PORTP002002		04/14/95	04/27/95	No Permit Required
EX199907103	022000-003	07/28/99	02/08/00	New production lines
AP200703022	062007-006	03/06/07	06/12/07	Sawdust Bin
EX199911099		11/29/99	12/13/99	Backup Boiler
EX200003108		03/30/00	05/17/00	Pre-fabricated boards
EX200007077	022001-012	07/21/00	02/22/01	New laminating process
EX2010021007	1097-020	07/11/97	10/21/97	requesting change to a multi-clone from a baghouse on a wood-fired (sawdust) boiler
EX2010021008		12/04/97	12/18/97	Consolidate two processes, wood putty application and undercoating application, into one mechanized process.
EX2010021020	OP2000-072	05/13/97	06/09/00	Wood Flooring
AP200806023	OP2007-060A	06/10/08	02/17/10	Add NSR permit
AP200806081		06/30/08	08/25/08	Saw changes
EX199803014		03/02/98	03/25/98	Applicability request regarding proposed construction project
AP200412027	OP2007-060	12/09/04	11/26/07	Wood Flooring
EX44400021005	1186-005	08/12/86	11/03/86	wood waste fired boiler
EX44400021006	1194-009	07/13/94	11/07/94	
AP200107060		07/17/01	09/11/06	New equipment
AP200205076		05/10/02	07/09/02	Wood-fired boilers, Subpart DDDDD - Not Major for HAPs

### **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 the following requirements to not be applicable to this installation at this time for the reasons stated.

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

### **Construction Permit Revisions**

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

- 1) Permit Number 1097-020 contained 12.68 pounds per hour the limit for EU0030 - Sawdust Fired IBC Boiler. The correct limit is 0.32 lbs/MMBTU heat input or 7.49 pounds per hour.
- 2) Permit Number 022001-012 contained a performance testing for Methylene diphenyl diisocyanate (CAS No. 101-68-8) emissions from the Roller Cotter – Wood (EU0130) and Roller Coater – FRP (EU0140) to demonstrate that the hourly emission rate does not exceed 0.0965 pounds per hour from the adhesive application process. The test was conducted on September 10 and 11, 2001. The test result of 0.000066 pounds per hour showed that the units are in compliance with the emission limit. This condition does not appear in the operating permit. No other special conditions exist.

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

10 CSR 10-6.070, *New Source Performance Regulations*

40 CFR Part 60 Subpart D, *Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971.*

The provisions of this subpart apply to each fossil-fuel-fired steam generating unit of more than 73 megawatts heat input rate (250 million Btu per hour) constructed or modified after August 17, 1971 and not covered under Subpart Da. None of the boilers are more than or equal to the the applicability rate of 250 million Btu per hour, therefore this subpart does not apply to this installation.

10 CSR 10-6.070, *New Source Performance Regulations*

40 CFR Part 60 Subpart Da, *Standards of Performance for Electric Utility Steam Generating Units for Which Construction Is Commenced After September 18, 1978*

The provisions of this subpart apply to each electric utility fossil-fuel-(either alone or in combination with any other fuel) fired steam generating unit of more than 73 megawatts heat input rate (250 million Btu per hour) constructed or modified after September 18, 1978. None of the boilers are electric utility steam generating units as defined in this subpart, therefore this subpart does not apply to this installation.

10 CSR 10-6.070, *New Source Performance Regulations*

40 CFR Part 60 Subpart Db, *Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units*

The provisions of this subpart apply to each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 29 MW (100 million Btu/hour). None of the boilers are more than or equal to the the applicability rate of 100 million Btu per hour, therefore this subpart does not apply to this installation.

10 CSR 10-6.070, *New Source Performance Regulations*

40 CFR 60 Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units*

This subpart applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu/hr) or less, but greater than or equal to 2.9 MW (10 million Btu/hr). EU0030, constructed in 1986, is not subject to this subpart

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

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants

40 CFR Part 63, *Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations*

The affected source to which this subpart applies is each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source as defined in 40 CFR Part 63, subpart A, §63.2. This subpart does not apply to this installation because the installation is not a major source of HAPs nor is engaged in the manufacture of wood furniture as defined in this subpart.

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants

40 CFR 63, *Subpart JJJJJJ - National Emission Standards for Hazardous Air Pollutants for Source Category: Industrial, Commercial, and Institutional Boilers Area Sources*

This MACT standard applies to two boilers at the Havco facility, Emission Unit EU0020 (Hurst Boiler) constructed in 1991 and Emission Unit EU0030 (IBC Boiler) constructed in 1986. Both boilers were constructed prior to the June 4, 2010 date in the standard, therefore are considered "existing sources". The two regulated boilers will be subject to work practice standards including biennial tune-ups of the boilers, a one-time energy assessment, reporting, and recordkeeping requirements. The United States Environmental Protection Agency (USEPA) proposed changes to the final rule in December 2011 and the changes have not been promulgated to date. Havco will comply with the requirements and deadlines in the final rule.

**National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability Issues**

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants

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

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.

### Compliance Assurance Monitoring (CAM) Applicability

#### 40 CFR Part 64, Compliance Assurance Monitoring (CAM)

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

The permittee previously had two pollutant-specific emission units that required a CAM Plan. One unit is the Sanding Operation (EU0120) used to sand large wood panels after they have been assembled. This operation is controlled by an Alanco baghouse that filters approximately 106,102 cubic feet of air from the sanding operation and various other operations within the plant. The other unit is the Edge Trimmer (EU0150) used to clean up the panels prior to them being shipped for sale. The Edge Trimmer is controlled by an Alanco baghouse that filters approximately 7,500 cubic feet of air from the edge trimming operation. Since the issuance of the previous operating permit, the permitting authority has changed the requirements of state rule 10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes, such that the only limit applied to these two emission units is visible emissions, provided that they operate and maintain their control devices. Therefore, the CAM Plan has been dropped as a requirement for this operating permit.

### Greenhouse Gas Emissions

This installation is a not major source for greenhouse gases. While Part 70 permits generally do not establish new emissions limits, they consolidate applicable requirements, as defined in Missouri State Regulations 10 CSR 10-6.020(2)(A)23, into a comprehensive air permit. At the time of permit issuance, there were no applicable GHG requirements for this source.



<http://www.epa.gov/gg>

### Greenhouse Gas Reporting Program Applicability Tool

#### Calculation Worksheet for Stationary Fuel Combustion Sources

*Instructions.* The fuel-feed types you selected for the facility are presented below. Input the annual amounts combusted for each type.

Selected Stationary Source Combustion Fuels for Facility*	Annual Amount Combusted	Unit of Measure	CO <sub>2</sub> ** (metric tons/yr)	CH <sub>4</sub> (metric tons/yr)	N <sub>2</sub> O (metric tons/yr)
Natural Gas (weighted U.S. average)	0	Standard cubic feet	0	0	0
Wood and Wood Residuals	16812	Short tons	0	8	1
Emissions			0	8	1
Global Warming Potential (GWP)			1	21	310
CO <sub>2</sub> e Emissions			0	168	310
Annual CO <sub>2</sub> e Emissions for Selected Fuels (metric tons/year)					478

\* Emissions from fuels combusted in emergency generators and portable equipment should not be counted toward the Applicability.

\*\* CO<sub>2</sub> emissions from biomass-derived fuels are not counted toward the Applicability. Emissions from municipal solid waste (MSW) and tires are adjusted by the GHG emissions calculator to account for the fact that MSW is typically about 60 percent biogenic in origin and tires are typically about 20 percent biogenic in origin.

This source is not subject to the Greenhouse Gas Reporting Rule. Missouri regulations do not require the installation to report CO<sub>2</sub> emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO<sub>2</sub> emissions were not included within this permit.

**Updated Potential to Emit for the Installation**

Pollutant	Potential to Emit (tons per year) <sup>8</sup>
CO	143
CO <sub>2</sub> e	7,927
HAP	1
NO <sub>x</sub>	57
PM <sub>10</sub>	4,544
PM <sub>25</sub>	15
SO <sub>x</sub>	6
VOC	6,143

**Other Regulatory Determinations**

1) 10 CSR 10-6.405, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

The maximum allowable particulate emission rate for new sources (in the outstate Missouri area constructed after February 24, 1971 as defined in 10 CSR 10-6.020) in an installation of indirect heating sources with a heat input rate equal to or greater than ten (10) million BTU per hour and less than or equal to five thousand (5000) million BTU per hour is determined by the following equation:

$$E = 1.13(Q)^{-0.338}$$

where; E = the maximum allowable particulate emission rate in pounds per million Btu of heat input, rounded off to two (2) decimal places, and Q = the installation heat input in millions of Btu per hour.

The wood waste boilers have multiple cyclones which provide an overall PM control efficiency of 80%. The potential to emit of the boiler when combusting sawdust and operating the control device is 0.0094 pounds of PM per MMBtu (WebFIRE factor for SCC 10200903, PM, filterable, multiple cyclone w/0 fly ash injection). Since the calculated allowable is 0.22 pounds per MMBtu, the boiler rate is 4.3% of the allowable. Therefore, it is highly unlikely that the allowable emission rate will ever be exceeded with the control device operating.

2) 10 CSR 10-6.260, *Restriction of Emissions of Sulfur Compounds*

Based upon the AP-42, Section 1.67, the emission factor for the wood waste boilers is 0.025 pounds per MMBtu for sulfur dioxide. Because this is 0.3% of the allowable without control, it is highly unlikely that the wood waste boilers will exceed the emission limitation of 8 pounds per MMBtu. Therefore, no recordkeeping or monitoring is required.

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

3) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

This state rule limits the amount of particulate matter that is allowed from an emission unit, and is dependent on the process weight or material rate processed. The emission units to which this rule applies are listed in *Appendix A* to this *Statement of Basis*. The *Appendix* shows the calculations and the rule results. Specifically, the *Appendix* identifies the exemptions for which the operations are qualified.

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

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

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

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

Prepared by:

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Randy E. Raymond  
Environmental Technician

**Appendix A**

EU	Description	Maximum Hourly Design Rate	Process Weight Rate (ton/hr)	PM Emission Factor (lb/ton)	Capture Device Efficiency (%)	Control Device Efficiency (%)	Uncontrolled Emission Rate (lb/hr)	Controlled Emission Rate (lb/hr)	Allowable Emission Rate (lb/hr)	PTE is less than 0.5 lbs per hour? (with control / without control)	Is unit in compliance without controls?	Is the Control Efficiency Greater Than 90%?	Is unit in compliance with controls?	PTE as percentage of Allowable
EU0010	Planer	7300 SCFM	34.120	0.00	100	1.8	0.75	0.74	41.09	NO	YES	NO	YES	2%
EU0010A	Clamshell		1.500	2.00	100	78.1	3.00	0.66	5.38	NO	YES	NO	YES	12%
EU0060	Gang Rip Saws (20 ton/hour)	106,102 SCFM	74.620	0.00	100	99.0	10.90	0.11	48.38	YES/w	YES	YES	YES	0%
	Abrasive Sanders (15.14 ton/hour)													
	Defect Saws (14.28 ton/hour)													
	Panel Rip Saws (10.2 ton/hour)													
	Panel Crosscut Saws (10.2 ton/hour)													
	Dust Hog (4.8 ton/hour)													
EU0070	Glue Handling & Mixing		0.150	20.00	100	99.0	3.00	0.03	1.15	YES/w	NO	YES	YES	3%
EU0100	Sawdust Storage		20.000	1.00	100	78.1	20.00	4.39	30.51	NO	YES	NO	YES	14%
EU0180	FRP Crosscut Saw	2400 sqft/hour	4.800	0.05	100	99.0	0.26	0.00	11.73	YES/wo	YES	YES	YES	0%
EU0120	Sanding	2400 sqft/hour	4.800	50.00	100	99.0	240.00	2.40	11.73	NO	NO	YES	YES	20%
EU0150	Edge Trimmer	2400 sqft/hour	4.800	7.00	100	99.0	33.60	0.34	11.73	YES/w	NO	YES	YES	3%

Mr. Charles Bradford  
Havco Wood Products, Inc.  
P.O. Box 1342  
Cape Girardeau, MO 63702-1342

Re: Havco Wood Products, Inc., 201-0021  
Permit Number: **OP2013-064**

Dear Mr. Bradford:

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

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

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Randy Raymond 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:rrk

Enclosures

c: Southwest Regional Office  
PAMS File: 2012-05-110