Missouri Department of Natural Resources
Air Pollution Control Program

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 here in.

Operating Permit Number: **OP2007-060A**
Expiration Date: November 25, 2012
Installation ID: 201-0021
Project Number: 2008-06-023

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 WP, Inc.
3200 East Outer Road
Scott City, MO 63780

Installation Description:
Manufacturer of wood flooring for tractor-trailer beds in Scott City, Missouri.

FEB 10 2010

Effective Date

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Havco Wood Products, Inc. (Havco) produces wood flooring for tractor-trailer beds at their installation 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:

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO_x)	Nitrogen Oxides (NO_x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2008	39.45	2.42	21.26	1.61	57.98	0.00	0.00
2007	47.08	3.05	26.82	2.03	73.13	0.00	0.00
2006	51.20	3.21	28.74	2.82	77.45	0.00	0.00
2005	49.91	3.12	28.32	3.36	74.01	0.00	0.02
2004	49.68	3.05	28.32	5.92	72.99	—	—

Havco Wood Products, Inc. received a renewed P70 Operating Permit (OP2007-060) on November 26, 2007. Havco requested amendments to the P70 Operating Permit based on the New Source Review Permit (Permit No. 062007-006) issued on June 12, 2007, for construction of a new clamshell sawdust bin (EU0010A) to replace one of two sawdust trailers. The clamshell sawdust bin is controlled by a cyclone at the exhaust of the existing pre-surface operation (Head Planer - EU0010).

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	EIQ Reference #	Description of Emission Unit
EU0010	EP-01	Head Planer
EU0010A	EP-01A	Clamshell Sawdust Bin
EU0020	EP-04B	AES Boiler – Sawdust Fired
EU0030	EP-05	IBC Boiler – Sawdust Fired
EU0060	EP-17	Saw Dust Recovery System
EU0061	EP-17	Lines 2 & 3 Abrasive Sanders
EU0062	EP-17	Lines 2 & 3 Defect Saws
EU0063	EP-17	Lines 2 & 3 Panel Rip Saws
EU0064	EP-17	Lines 2 & 3 Panel Crosscut Saws
EU0065	EP-17	Dust Hog
EU0070	EP-18	Glue Handling and Mixing
EU0080	EP-19	Glue Handling
EU0100	EP-22	Sawdust Storage Silos
EU0110	EP-23	Backup Boiler – Natural Gas Fired
EU0120	EP-24	Sanding Operation
EU0150	EP-28	Edge Trimmer

EMISSION UNITS WITHOUT LIMITATIONS

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

EIQ Reference #	Description of Emission Unit
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
EP-20	Undercoating Spray
EP-21	Wood Putty
EP-25	Roller Coater – Wood (EU0130)
EP-26	Roller Coater – FRP (EU0140)
EP-27	FRP Crosscut Saw (EU0180)

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

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.

Permit Condition PW001

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

Emission Limitation:

1) No owner or other person shall cause or permit to be discharged into the atmosphere from any new source of emission, not exempted under this rule, any visible emissions with an opacity greater than 20%.
2) Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60%.

Monitoring:

1) The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be 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 following monitoring schedule must be maintained:
   a) Observations must be made once per month. If a violation is noted, then
   b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then monitoring reverts to monthly monitoring.

Record keeping:

1) The permittee shall maintain records of all observation results (see Attachment A), noting:
   a) Whether any air emissions (except for water vapor) were visible from the emission units,
   b) All emission units from which visible emissions occurred, and
   c) Whether the visible emissions were normal for the process.
   d) The permittee shall maintain records of any equipment malfunctions.
2) The permittee shall maintain records of any other Method 9 test performed in accordance with this permit condition. (See Attachment B)

Reporting:

1) 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 permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

EU0010 through EU0010 – Head Planer			
Emission Unit	Description	Manufacturer/ Model #	2006 EIQ Reference #
EU0010	Two (2) Head Planer - Pre-surfacing of green lumber, Constructed 1984	Newman Whitney/ S382	EP-01

Permit Condition EU0010-001

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

Emission Limitation:

1) The permittee shall not emit particulate matter in excess of 21.67 lbs/hr from this emission unit.
2) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Monitoring/Recordkeeping/Reporting:

Not required (See Statement of Basis).

EU0010A – Clamshell Sawdust Bin		
Emission Unit	Description	2006 EIQ Reference #
EU0010A	Clamshell dust bin used to load sawdust into trucks, Constructed 2007	EP-01A

Permit Condition EU0010A-001

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

Emission Limitation:

1) The permittee shall not emit particulate matter in excess of 5.38 lbs/hr from this emission unit.
2) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Monitoring/Recordkeeping/Reporting:

Not required (See Statement of Basis).

EU0020 - AES Boiler			
Emission Unit	Description	Manufacturer/ Model #	2006 EIQ Reference #
EU0020	AES Boiler – Saw dust fired 29.1 MMBtu/hr boiler with multiple cyclones, Constructed 1991	Advanced Engineering Systems/S382	EP-04B

Permit Condition EU0020-001

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

Record Keeping:
The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. The owner or operator of an affected facility that only burns very low sulfur fuel oil or other liquid or gaseous fuels with potential sulfur dioxide emissions rate of 140 ng/J (0.32 lb/MMBtu) heat input or less shall record and maintain records of the fuels combusted during each calendar month. [40 CFR 60.48c(g)]

Permit Condition EU0020-002

10 CSR 10-6.060
Construction Permits Required

Construction Permit No. 1194-009

Operational Limitation:
1) While this boiler is in operation, boiler emission shall be controlled at all times by a multiple cyclone system.
2) Only wood waste generated at this facility shall be burned in this boiler.

EU0030 – IBC Boiler			
Emission Unit	Description	Manufacturer/ Model #	2006 EIQ Reference #
EU0030	AES Boiler – Saw dust fired 29.1 MMBtu/hr boiler with multiple cyclones, Constructed 1986	Advanced Engineering Systems/S382	EP-05

Permit Condition EU0030-001

10 CSR 10-6.060
Construction Permits Required,

Construction Permit No. 1197-020

Operational Limitation:
1) The multiple cyclone system proposed in this permit application shall be well maintained and used at all times while the boiler is in operation.

2) Only wood waste generated at this facility shall be burned in this boiler.
3) Havco shall maintain an operating and maintenance log for the cyclone system which shall include the following:
   a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
   b) Maintenance activities, with inspection schedule, repair actions, and replacements.

Permit Condition EU0030-002

10 CSR 10-3.060
Maximum Allowable Emissions of Particular Matter From Fuel Burning Equipment Used for Indirect Heating

Emission Limitation:
The permittee shall not emit particulate matter in excess of 0.31 pounds per million Btu of heat input from IBC Boiler (EU0030).

Monitoring:
1) Visible emissions will be used as an indicator of the proper operation of the control device. During proper operation no visible emissions are expected from this emission unit. The existence of visible emissions will indicate a decrease in the efficiency of the control device and corrective actions will be implemented. Observations will be made using a U.S. EPA Method 22 trained observer and U.S. EPA Method 22 like procedures.
   a) Frequency: - Visible emissions from the exhaust shall be monitored on a daily basis when the IBC Boiler is in operation.
   b) Duration: - The duration of the observation shall be for a 2 minute time period.
   c) Threshold: - The condition of no visible emissions is considered normal for this emission unit. When visible emissions are noted from the emission unit, it shall be documented and corrective actions undertaken.
   d) The observation of visible emissions from this emission unit will be considered an excursion and corrective actions shall be implemented within a reasonable period. An excursion does not necessarily indicate a violation of the applicable requirement. When the level of excursions exceed three percent of the of the total number of observations in a six month period and corrective actions fail to return the emission unit to a no visible emission condition, then the permittee shall conduct source testing within 90 days of the last excursion to demonstrate compliance with 10 CSR 10-3.060. If the test demonstrates noncompliance with the above emission limitation the permittee shall propose a schedule to implement further corrective actions to bring the source into compliance and demonstrate that compliance.
2) The control equipment shall be maintained and operated according to the manufacturer's specifications.

Record Keeping:
The permittee shall maintain records of all observations. At a minimum the following observation conditions shall be noted:
1) The date and time of the observation and the weather condition;
2) Observations of visible emissions from the emission unit. Note: The absence of visible emission may be reported in a statement such as "No visible emissions were observed from this emission unit;" and

3) The corrective actions taken during excursions. Maintenance and inspection records shall also be maintained for the control device on this emission unit. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.

Reporting:

1) 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 permittee determined that the emission unit exceeded the emission limitation.
2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

Permit Condition EU0030-003

10 CSR 10-6.260
Restriction of Emission of Sulfur Compounds

Emission Limitation:

1) No person shall 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.
2) No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards. [10 CSR 10-6.260(3)(B) & 10 CSR 10-6.010 Ambient Air Quality Standards] [1]

Monitoring/Recordkeeping/Reporting:

Not required (See Statement of Basis).

[1] 10 CSR 10-6.260(3)(B) is a state-only requirement

EU0060 through EU0065 - Lines 2 & 3 Sawdust Recovery System The Operation Includes: Saws, Sanders and Dust Hog with Fabric Filter, Constructed 2000			
Emission Unit	Description	Manufacturer/ Model #	2006 EIQ Reference #
EU0060	Lines 2 & 3 Gang Rip Saws	Mereen Johnson/424DC	EP-17
EU0061	Lines 2 & 3 Abrasive Sanders	Timesavor/TBO30	
EU0062	Lines 2 & 3 Defect Saws	Precision Products/141M-HJ	
EU0063	Lines 2 & 3 Panel Rip Saw	Rosenquist Inc./Custom	
EU0064	Lines 2 & 3 Panel Crosscut Saws	HendricK/HS-78	
EU0065	Dust Hog	Montgomery/66--PM	

Permit Condition EU0060-001 through EU0065-001

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

10 CSR 10-6.060
Construction Permits Required

Construction Permit No. 022000-003

Emission Limitation:

1) The permittee shall not emit particulate matter in excess of 48.38 lbs/hr from the saw dust recovery system. [10 CSR 10-6.400]
2) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases. [10 CSR 10-6.400]

Operational Limitation/Equipment Specifications:

Havco shall control emissions from the sawdust recovery system (EP-17) using a baghouse as specified in the construction permit application. The baghouse must be in use at all times when the process is in operation, and shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse shall be equipped with a gauge or meter which indicates the pressure drop across the baghouse. This gauge or meter shall be located such that it may be easily observed by the Department of Natural Resources' employees. Replacement bags for the baghouse shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
[Construction Permit 022000-003, Special Condition 3]

Monitoring/Recordkeeping

1) Havco shall monitor and record the operating pressure drop across the baghouse at lease once every twenty-four hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
   [Construction Permit 022000-003, Special Condition 4]
2) Havco shall maintain an operating and maintenance log for the baghouse which shall include the following: [Construction Permit 022000-003, Special Condition 5]
   a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
   b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

Reporting:

1) 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 permittee determined that the emission unit(s) deviated from the normal operating pressure drop range.
2) Reports of any deviations from monitoring other than the pressure drop range, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

EU0070 – Glue Handling and Mixing			
Emission Unit	Description	Manufacturer/ Model #	2006 EIQ Reference #
EU0070	Glue handling and mixing exhaust system with fabric filter, Constructed 2000	Advanced Engineering Systems/S382	EP-18

Permit Condition EU0070-001

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

10 CSR 10-6.060
Construction Permits Required

Construction Permit No. 022000-003

Emission Limitation:

1) The permittee shall not emit particulate matter in excess of 1.15 lbs/hr from the glue handling and mixing exhaust system. [10 CSR 10-6.400]
2) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases. [10 CSR 10-6.400]

Operational Limitation/Equipment Specifications:

Havco shall control emissions from the glue handling and mixing exhaust system (EP-18) using a baghouse as specified in the construction permit application. The baghouse must be in use at all times when the process is in operation, and shall be operated and maintained in accordance with the manufacturer's specifications. The baghouse shall be equipped with a gauge or meter which indicates the pressure drop across the baghouse. This gauge or meter shall be located such that it may be easily observed by the Department of Natural Resources' employees. Replacement bags for the baghouse shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Construction Permit 022000-003, Special Condition 3]

Monitoring/Recordkeeping

1) Havco shall monitor and record the operating pressure drop across the baghouse at lease once every twenty-four hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Construction Permit 022000-003, Special Condition 4]
2) Havco shall maintain an operating and maintenance log for the baghouse which shall include the following: [Construction Permit 022000-003, Special Condition 5]

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

Reporting:

1) 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 permittee determined that the emission unit(s) deviated from the normal operating pressure drop range.
2) Reports of any deviations from monitoring other than the pressure drop range, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

EU0080 – Glue Handling			
Emission Unit	Description	Manufacturer/ Model #	2006 EIQ Reference #
EU0080	Glue handling, Constructed 2000	Black Brothers Inc./ 22D-650	EP-19

Permit Condition EU0080-001

10 CSR 10-6.060
Construction Permits Required, Construction Permit No. 022000-003

Operational Limitation/Equipment Specifications:

Havco shall control formaldehyde emissions from the glue handling process (EP-19) using a wet scrubbing system. This scrubber shall be in use at all times when the glue handling process is in operation. This wet scrubber shall be equipped with a gauge or meter which indicates the water flowrate to the scrubber. This gauge or meter shall be located such that it may be easily observed by the Department of Natural Resources' employees. [Construction Permit 022000-003, Special Condition 1]

Monitoring/Recordkeeping

Havco shall monitor and record the water flowrate to the wet scrubber at least once every twenty-four hours. The water flowrate shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Construction Permit 022000-003, Special Condition 2]

EU0100 – Saw Dust Storage Silos			
Emission Unit	Description	Manufacturer/ Model #	2006 EIQ Reference #
EU0100	Saw dust storage Silos #2 and #3 with centrifugal collector	Havco/Custom	EP-22

Permit Condition EU0100-001

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

Emission Limitation:

1) The permittee shall not emit particulate matter in excess of 30.51 lbs/hr from this emission unit.
2) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Monitoring/Recordkeeping/Reporting:

Not required (See Statement of Basis).

EU0110 – Backup Boiler			
Emission Unit	Description	Manufacturer/ Model #	2006 EIQ Reference #
EU0110	Backup Boiler – Natural gas-fired, 15.35 MMBtu/hr boiler, Constructed 1999	York Shipley/ SPHC-3520-N5	EP-22

Permit Condition EU0110-001

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

Record Keeping:

The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. The owner or operator of an affected facility that only burns very low sulfur fuel oil or other liquid or gaseous fuels with potential sulfur dioxide emissions rate of 140 ng/J (0.32 lb/MMBtu) heat input or less shall record and maintain records of the fuels combusted during each calendar month. [40 CFR 60.48c(g)]

EU0120 – Sanding Operation EU0150 – Edge Trimmer			
Emission Unit	Description	Manufacturer/ Model #	2006 EIQ Reference #
EU0120	Sanding Operation, Constructed 2000 Connected to an Alanco baghouse (fabric filter) identified as CD24	Timesavers Inc./ 325-2ATF	EP-24
EU0150	Edge Trimmer, Constructed 1984 Connected to an Alanco baghouse (fabric filter) identified as CD27	KupperMuhle/ 10307	EP-28

Permit Condition EU0120-001 and EU0150-001

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

40 CFR Part 64
Compliance Assurance Monitoring (CAM)

Emission Limitation:

1) The permittee shall not emit particulate matter in excess of 11.73 lbs/hr from any of EU0120 and EU0150.
2) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Monitoring Basis:

The Department of Natural Resources, Air Pollution Control Program, Compliance/Enforcement Section has approved a Compliance Assurance Monitoring (CAM) Plan provided by the facility (see Attachment C). The CAM approach is as follows:

- The key elements of the monitoring approach, including the indicators to be monitored, indicator ranges, and performance criteria are presented in Table 1 of Attachment C. Visible emissions is selected as the CAM performance indicator for the baghouse.

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) 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 10-6.050 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 10-6.110 Submission of Emission Data, Emission Fees and Process Information
1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
2) 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 to satisfy the requirements of the Federal Clean Air Act, Title V.
3) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the Director.

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
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 10-3.030 Open Burning Restrictions

1) The permittee shall not conduct, cause, permit or allow a salvage operation, the disposal of trade wastes or burning of refuse by open burning.
2) Exception - Open burning of trade waste or vegetation may be permitted only when it can be shown that open burning is the only feasible method of disposal or an emergency exists which requires open burning.
3) Any person intending to engage in open burning shall file a request to do so with the Director. The request shall include the following:
   a) The name, address and telephone number of the person submitting the application; The type of business or activity involved; A description of the proposed equipment and operating practices, the type, quantity and composition of trade wastes and expected composition and amount of air contaminants to be released to the atmosphere where known;
   b) The schedule of burning operations;
   c) The exact location where open burning will be used to dispose of the trade wastes;
   d) Reasons why no method other than open burning is feasible; and
   e) Evidence that the proposed open burning has been approved by the fire control authority which has jurisdiction.
4) Upon approval of the open burning permit application by the Director, the person may proceed with the operation under the terms of the open burning permit. Be aware that such approval shall not exempt Havco Wood Products, Inc. from the provisions of any other law, ordinance or regulation.
5) The permittee shall maintain files with letters from the Director approving the open burning operation and previous Missouri Department of Natural Resources' inspection reports.

10 CSR 10-3.090 Restriction of Emission of Odors

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 requirement is not federally enforceable.**

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 10-6.250 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 record keeping 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.

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 Record Keeping and Reporting Requirements

1) Record Keeping
   a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
   b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
2) Reporting
   a) All reports shall be submitted to the Air Pollution Control Program'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, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
   d) Submit supplemental reports as required or as needed. 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 semiannual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.

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

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

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)1.I Reasonably Anticipated Operating Scenarios
None.

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

1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
   a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
   b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
   c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
   d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
3) All progress reports required under an applicable schedule of compliance shall be submitted semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
   a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
   b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by June 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, 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 application 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, 901 North 5th Street, Kansas City, KS 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

1) Section 502(b)(10) changes. Changes that, under Section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
   a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, 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, 901 North 5th Street, Kansas City, KS 66101, 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 application utilized in the preparation of this permit was signed by Mr. Bruce Bader, President. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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 A

10 CSR 10-6.220 Compliance Demonstration
Opacity Emission Observations

This attachment or an equivalent may be used to help meet the record keeping requirements of Permit Condition PW001

Method 22 Opacity Emission Observations			
Date	Method 22 Test Observer	Visible Emissions (yes/no)	If Visible emissions, was a method 9 done? (yes/no)

Attachment B

10 CSR 10-6.220 Compliance Demonstration

This attachment or an equivalent may be used to help meet the record keeping requirements of Permit Condition PW001.

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 C

COMPLIANCE ASSURANCE MONITORING PLAN
HAVCO WOOD PRODUCTS, INC.

Prepared for:

MR. DAVE LOWES
HAVCO WOOD PRODUCTS, INC.
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SCOTT CITY, MISSOURI 63780

Prepared by:

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1631 HEADLAND DRIVE
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January 2007
Contract C-04165
Revision 1

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RECORD OF REVISIONS

This Plan will be updated and amended whenever there is a change in facility design, construction, operation, or maintenance that changes the operation or parameters monitored of the affected control equipment. These amendments will be fully implemented as soon as possible.

A log for revisions to this Plan (provided below) is to be updated whenever the Plan is revised.

All revisions are to be dated, approved by an official with signatory authority, and updated in all copies of the Plan.

Revision No.	Date	List of Changes	Approved By
1	Jan 2007	Added EPA Reference Method 22 as an indicator for both baghouses.	

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1.0 COMPLIANCE ASSURANCE MONITORING

1.1 Background

Havco Wood Products, Inc. (Havco) has two affected emission units that require a compliance assurance monitoring (CAM) plan. A description of these emission units is included in the following table.

Emission Unit ID	EU0120	EU0150
Description	Sanding Operation	Edge Trimmer
Facility	Havco Wood Products, Inc Scott City, MO	Havco Wood Products, Inc. Scott City, MO

1.2 Applicable Regulation, Emission Limit, and Monitoring Requirements

The following table describes the applicable regulation, emission limits, and monitoring requirements for each of the affected emission units.

Emission Unit ID	EU0120	EU0150
Regulation	10 CSR 10-6.400	10 CSR 10-6.400
Emission Limit	12 lb/hr, 0.3 gr/scf	12 lb/hr, 0.3 gr/scf
Monitoring Requirement	Visible emissions, periodic monitoring (RM22), and Pressure Drop across baghouse	Visible emissions, periodic monitoring (RM22), and Pressure Drop across baghouse

1.3 Control Technology

The sanding operation (EU0120) is connected to an Alanco baghouse identified as control device no. 24. The edge trimmer (EU0150) is connected to an Alanco baghouse identified as control device no. 27.

1.4 Monitoring Approach

The key elements of the monitoring approach are presented in **Table 1 – Monitoring Approach**.

TABLE 1
HAVCO WOOD PRODUCTS, INC.
Monitoring Approach for Particulate Matter Emissions from the Sanding Operation (EU0120) and the Edge Trimmer (EU0150)

	Indicator #1	Indicator #2
Indicator	Visible Emissions	Pressure Drop
Measurement Approach	EPA Reference Method (RM) 22	Pressure drop across baghouse is monitored with a differential pressure gauge.
Indicator Range	The indicator range is defined as no visible emissions outside the range of normal operations for the emission unit. An excursion is defined as the presence of visible emissions. An excursion triggers an inspection, corrective action, and a reporting requirement. Excursions will be corrected within 8 hours.	The indicator range is defined as a pressure drop between 2 and 7 inches of water. An excursion is defined as a pressure drop less than 2 inches of water or greater than 7 inches of water. An excursion triggers an inspection, corrective action, and reporting requirement. Excursions will be corrected within 8 hours.
QIP Threshold	None	None
Performance Criteria		
Data Representativeness	Measurements are made at the stack exhaust while the baghouse is operating.	Pressure drop taps are located at the inlet and outlet of the baghouse. The gauge has a minimum accuracy of 0.25 inches of water.
Verification of Operational Status	NA	NA
QA/QC Practices and Criteria	The visible emission observer will be familiar with Method 22 and follow Method 22 procedures.	The pressure gauge is calibrated every 3 months the unit is in operation. Pressure drop taps are checked daily for plugging.
Monitoring Frequency	Daily	Daily
Data Collection Procedure	Manually recorded daily	Manually recorded daily.
Averaging Period	NA	NA
Reporting	Semiannually (i.e., Semiannual Monitoring Report)	Semiannually (i.e., Semiannual Monitoring Report)

2.0 JUSTIFICATION

2.1 Background

Havco has two pollutant-specific emission units that require 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.

2.2 Rationale for Selection of Performance Indicators

Visible emissions was selected as a performance indicator for the baghouses because it is indicative of good operation and maintenance of the baghouse. When the baghouse is operating properly, there will be no visible emissions. Any increase in visible emissions indicates reduced performance of the baghouse.

Pressure drop was chosen for the sanding and the edge trimming operations as a means of detecting a change in operation that could lead to an increase in emissions. An increase in pressure drop can indicate the cleaning cycle is not frequent enough, cleaning equipment is damaged, the bags are becoming blinded, or airflow has increased. A decrease in pressure drop may indicate broken or loose bags. A pressure drop across the baghouse also serves to indicate there is airflow through the control device.

2.3 Rationale for Selection of Indicator Ranges

The indicator range for the baghouses is no visible emissions outside the normal range of operations for the unit. An excursion triggers an inspection and corrective action within 8 hours. All excursions and corrective actions will be documented. An indicator range of no visible emissions outside normal operations of the unit was selected because an increase in visible emissions is indicative of an increase in particulate emissions. Although RM 22 applies to fugitive sources, the visible/no visible emissions observation technique of method 22 can be applied to ducted emissions (Method 22-like observations).

The indicator range for the sanding and edge trimming operations is a pressure drop across the baghouse of greater than 2 and less than 7 inches of water. An excursion triggers an inspection and corrective action within 8 hours. As the pressure drop approaches 7 inches of water, the bags are scheduled for replacement. This indicator is also used to monitor bypass of the control device. If the pressure drop falls below 2 inches of water during normal process operation, the possibility of a bypass is investigated. No Quality Improvement Plan (QIP) threshold has been selected for this indicator.

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 OP2007 - 035 Minor Modification Application, received June 10, 2007;
2) Renewal Part 70 Operating Permit (OP2007-060) issued November 26, 2007;
3) Part 70 Operating Permit Renewal Application, received December 9, 2004;
4) Initial P70 Operating Permit No. OP2000-072, issued June 9, 2005;
5) 2006 Emissions Inventory Questionnaire, received March 3, 2007;
6) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
7) U.S. EPA document - Factor Information Retrieval (FIRE) Data System, Version 6.21;
8) Construction Permit No. 1186-005A, Issued October 21, 1986;
9) Construction Permit No. 022001-012; and
10) Construction Permit No. 062007-006.

Explanation of the Permit Modification:
Havco Wood Products, Inc. received a renewed P70 Operating Permit (OP2007-060) on November 26, 2007. Havco requested amendments to the P70 Operating Permit based on the New Source Review Permit (Permit No. 062007-006) issued on June 12, 2007, for the construction of a new clamshell sawdust bin (EU0010A) to replace one of two sawdust trailers. The clamshell sawdust bin is controlled by a cyclone at the exhaust of the existing pre-surface operation (Head Planer - EU0010).

The green sawdust from the pre-surfacing operation used to exhaust through a fan into one of two sawdust trailers. With the new sawdust bin, one of the trailers is removed and the exhaust from the pre-surfacing operation is directed to the new bin with the remaining trailer as backup. Emissions from EP-01 (EU0010) will remain unchanged, as the fan will continue to exhaust at the same rate into the bin as it did into the two trailers. Fugitive emissions from the emission point EP-01 will decrease, as the enclosed bin will capture most of these emissions. There will be emissions from the clamshell dumping sawdust via gravity onto trucks. The area where trucks receive the sawdust is enclosed on two sides to decrease fugitive emissions. The maximum throughput for the new clamshell bin is 3000 lb/hr or 1.5 tons/hr.

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 10-6.260, *Restriction of Emission of Sulfur Compounds*
10 CSR 10-6.220, *Restriction of Visible Air Contaminants*
10 CSR 10-3.060, *Maximum allowable Emissions of Particulate Matter From Fuel burning Equipment Used for Indirect Heating*

These rules do not apply to the AES Boiler (EU0020) and the Back-up Boiler (EU0110) identified as EP-04B and EP-23 in the 2006 EIQ, respectively. These boilers are subject to 40 CFR Part 60, subpart Dc (NSPS). Per 10 CSR 10-6.260(1)(A)1., 10 CSR 10-6.220(1)(E) and 10 CSR 10-3.060(3)(E), these rules do not apply to sources subject to the provisions of NSPS. However, indirect heat input values from the boilers are used in the calculation of the installation's total heat input (Q) to determine the maximum allowable particulate matter from fuel burning equipment used for indirect heating.

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) Construction 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/hr.
2) Construction 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 lbs/hr showed that the units are in compliance with the emission limit. No other special conditions exist.

New Source Performance Standards (NSPS) Applicability

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.

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.

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.

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).

The AES Boiler, EP-05, (EU0030) and the Back-up Boiler, EP-23, (EU0110) are rated at greater than 10 MMBtu/hr but less than 100 MMBtu/hr and constructed after the applicability date of this subpart, therfore are subject to this subpart. Whereas the IBC boiler, constructed in 1986, is not subject to this subpart

Maximum Available Control Technology (MACT) Applicability

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.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

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

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.

Havco has two pollutant-specific emission units that require 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. Therefore, CAM requirements are included in the permit.

Other Regulatory Determinations

1) 10 CSR 10-3.060, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*, compliance determination.
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. (This limit is applied to the IBC Boiler (EU0030)).

$$Q = \left(29.1\frac{MMBtu}{hr}\right) + \left(23.4\frac{MMBtu}{hr}\right) + \left(15.35\frac{MMBtu}{hr}\right) = 67.85\frac{MMBtu}{hr}$$

$$E = 1.13(67.85)^{-0.338} = 0.31\frac{lbs}{MMBtu}$$

The IBC Boiler has 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 0.08 lbs PM/MMBtu (0.417 lbs PM /MMBtu, uncontrolled factor from AP-42, Section 1.67). It is highly unlikely that the allowable emission rate will be exceeded with the control device operating. Monitoring and recordkeeping will be required to ensure that the control device is operating properly.

2) 10 CSR 10-6.260, *Restriction of Emissions of Sulfur Compounds*
Based upon the AP-42, Section 1.67, emission factor of 0.025 lbs/MMBtu for sulfur oxide emissions from wood waste combustion, it is highly unlikely that the IBC Boiler (EU0030) will exceed the emission limitation of 8 lbs/MMBtu. Therefore, no record keeping or monitoring is required.

3) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*
10 CSR 10-6.400 limits the amount of particulate matter that is allowed from an emission unit, and is dependent on the process weight rate material processed. The emission units to which this rule applies are listed below. The following calculations provide the allowable particulate emission rate based on 10 CSR 10-6.400 and the potential (maximum) emission rate including particulate emission control equipment. Potentials to emit presented below were calculated based on sources Maximum Design Rate (MDR). If the emissions from these emission units can not violate the limits of this rule then evidence of this is demonstrated in the following calculations.
One of the following equations from 10 CSR 10-6.400 is used to calculate the PM allowable limit:
$E = 4.10P^{0.67}$ for process weight rates up to 30 tons (60,000 lbs) per hour, and
$E = 55.0P^{0.11} - 40$ for process weight rates greater than 30 tons (60,000 lbs) per hour
Where: E = rate of emission in lb/hr; and
P = process weight rate in tons/hr (maximum hourly design rate)

a) EU0010 – Two Head Planer (EIQ Ref. #EP-01)
Process weight rate (P) = 34.12 tons/hr
Emission limit (lb/hr) = $55.0P^{0.11} - 40 = (55.0 \times 34.12^{0.11}) - 40 = 41.09$ lb PM/hr
MDR = 7,300 SCFM (standard cubic feet per minute)
PM emission factor = 0.9 lb/SCFM-Year (FIRE 6.21, SCC: 3-07-008-05)
Control device (Pneumatic/Gravity System) Efficiency = 1.785, Capture Efficiency = 100%
PM uncontrolled emission =[7,300 SCFM x 0.9lb/SCFM-Year x 1 Year/8760 hr] = 0.75 lb/hr
PM controlled emission = 0.75 lb/hr × (1 – 0.01785) = 0.74 lb/hr

At the maximum design rate (7300 SCFM), the potential PM emission rate based on FIRE 6.21 factor is approximately fifty-four and eight tenth eight (54.8) times less than the allowable PM emission rate. It is highly unlikely that the allowable emission rate will be exceeded.

b) EU0010A – Clamshell Sawdust Bin
Process weight rate (P) = 1.5 tons/hr
Emission limit (lb/hr) = $4.10P^{0.67} = (4.10 \times 1.5^{0.67}) = 5.38$ lb PM/hr
PM emission factor = 2 lb/ton (FIRE 6.25, SCC: 3-07-030-02)
Control device (Centrifugal Collector) Efficiency = 78.05%, Capture Efficiency = 100%
PM uncontrolled emission =[1.5 tons/hr x 2 lb/ton] = 3 lbs/hr
PM controlled emission = 3 lbs/hr × (1 – 0.7805) = 0.66 lbs/hr

At the maximum hourly design rate (1.5 tons/hr), the uncontrolled emission rate (3 lbs/hr) is approximately one and eight tenth (1.8) times less than the allowable emission rate (5.38 lbs/hr). It is highly unlikely that the allowable emission rate will be exceeded, therefore there are no recordkeeping or monitoring requirements.

c) EU0060 – EU0065 Saw Dust Recovery System
The emissions generated from these units is exhausted through a low temperature fabric filter designated as CD18. Since the emission factor for the PM generated by these units is dependent upon the control device, it is assumed that the process weight would be the aggregate of the throughputs of all units that make up the dust recovery system.
Gang Rip Saw = 20 tons/hr (2 lines)
Abrasive Sanders = 15.14 tons/hr (2 lines)
Defect Saws = 14.28 tons/hr (2 lines)
Panel Rip Saw = 10.2 tons/hr (2 linesw)
Panel Cross Cut Saw = 10.2 tons/hr (2 lines)
Dust Hog = 4.8 tons/hr (2 lines)
Process weight rate (P) = 74.62 tons/hr
Emission limit (lb/hr) = $55.0P^{0.11} - 40 = (55.0 \times 74.62^{0.11}) - 40 = 48.38$ lbs PM/hr
MDR = 106,102 SCFM)
PM emission factor = 0.9 lb/SCFM-Year (FIRE 6.21, SCC: 3-07-008-04)
Control device (Fabric Filter) Efficiency = 99%, Capture Efficiency = 100%
PM uncontrolled emission =[106102 SCFM x 0.9lb/SCFM-Year x 1 Year/8760 hr] = 10.90 lb/hr
PM controlled emission = 10.90 lbs/hr × (1 – 0.99) = 0.11 lb/hr

At the maximum design rate (106,102 SCFM), the potential PM emission rate based on FIRE 6.21 factor is approximately four and four tenth (4.4) times less than the allowable PM emission rate. It is highly unlikely that the allowable emission rate will be exceeded.

d) EU0070 – Glue Handling and Mixing (EIQ Ref. #EP-18)
Process weight rate (P) = 0.15 tons/hr
Emission limit (lb/hr) = $4.10P^{0.67}$ = ($4.10 \times 0.15^{0.67}$) = 1.15 lbs PM/hr
PM emission factor = 20 lbs/ton (FIRE 6.25, SCC: 3-01-014-01)
Control device (Fabric Filter) Efficiency = 99%, Capture Efficiency = 100%
PM uncontrolled emission =[0.15 ton/hr x 20lb/ton] = 3 lbs/hr
PM controlled emission = 3 lbs/hr × (1 – 0.99) = 0.03 lb/hr

At the maximum design rate (0.15 ton/hr), the potential PM emission rate based on FIRE 6.25 factor is approximately two and six tenth (2.6) times more than the than the allowable PM emission rate (1.15 lbs/hr). The process is equipped with a fabric filter (99% control efficiency); the controlled emission rate (0.03 lb/hr) is approximately thirty-eight (38) times less than the allowable emission rate. It is highly unlikely that the allowable emission rate will be exceeded with the control device operating. Monitoring and recordkeeping will be required to ensure that the control device is operating properly.

e) EU0100 – Sawdust Storage Silo (EIQ Ref. #EP-22)
Process weight rate (P) = 20 tons/hr
Emission limit (lb/hr) = $4.10P^{0.67}$ = ($4.10 \times 20^{0.67}$) = 30.51 lb PM/hr
PM emission factor = 1 lb/ton (FIRE 6.25, SCC: 3-01-014-01)
Control device (Centrifugal Collector) Efficiency = 78.05%, Capture Efficiency = 100%
PM uncontrolled emission =[20 tons/hr x 1b/ton] = 20 lbs/hr
PM controlled emission = 20 lbs/hr × (1 – 0.7805) = 4.39 lbs/hr

At the maximum hourly design rate (20 tons/hr), the uncontrolled emission rate (20 lbs/hr) is approximately one and one-half (1.5) times less than the allowable emission rate (30.51 lbs/hr). . It is highly unlikely that the allowable emission rate will be exceeded, therefore there are no recordkeeping or monitoring requirements.

f) EU0180 – FRP Crosscut Saw (EIQ Ref. #EP-27)
MHDR = 2,400 ft^2 /hr
PM emission factor = 0.000109 lb PM/ft^2 (OP application)
PM emission = 2,400 ft^2/hr x 0.000010 lb/ft^2 = 0.26 lb/hr
At the maximum hourly design rate , the uncontrolled emission rate (0.26 lb/hr) is less than the allowed exemption level of 10 CSR 10-6.400(1)(B)11. (i.e., 0.5 lb/hr), therefore this unit is not subject to the provisions of this rule.

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).

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