



Missouri Department of Natural Resources
Air Pollution Control Program

INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2010-010
Expiration Date: JAN 07 2015
Installation ID: 105-0001
Project Number: 2007-04-016

Installation Name and Address

Independent Stave Co. Inc.
1078 S. Jefferson St.
Lebanon, MO 65536
Laclede County

Parent Company's Name and Address

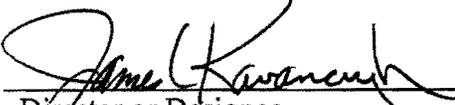
ISCO Holding Co.
PO Box 104
Lebanon, MO 65536

Installation Description:

Independent Stave Co., Inc. operates a wine and bourbon barrel toasting facility in Lebanon, Missouri.

JAN 08 2010

Effective Date



Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Independent Stave Co., Inc. operates a bourbon and wine barrel toasting facility in Lebanon, Missouri.

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)	Particulate Matter ≤ 2.5 Microns (PM _{2.5})
2008	13.16	1.62	32.70	1.13	37.88	0.003	6.35
2007	21.05	3.01	60.11	4.61	72.35	0.0002	15.55
2006	22.60	2.65	38.61	3.32	61.55	-	16.17
2005	20.22	2.97	59.23	4.54	71.27	-	16.14
2004	14.86	2.32	33.23	2.87	53.58	-	-

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EU0001	Propane Fired Chip Roasters (4), EP#51
EU0002	Stave Planers (3), EP#1
EU0003	Stave Jointers (19), EP#1
EU0004	Pneumatic Transfer to CD1 from CD10
EU0005	Pneumatic Transfer to Heine Fuel Bin from CD1, EP#2
EU0006	Trailer Loadout/Transfer, EP#15
EU0007	Pneumatic Transfer to Trailer from CD11, EP#15
EU0008	Hammermill #1/Rotex Screen Baghouse #5, EP#19
EU0009	Pneumatic Transfer to Cleaver Brooks Storage Silo from CD1, EP#27
EU0010	Pneumatic Transfer to Silo from CD6, EP#27
EU0011	Hammermill #2, EP#32
EU0012	Roaster Mechanical Tumbling of Wood, EP#53
EU0013	Alternatives Rip Saws, EP#41
EU0014	Alternatives Chop Saws, EP#41
EU0015	Alternatives Band Saw, EP#41
EU0016	Alternatives Planer, EP#41
EU0017	Alternatives Rip/Chop Saws, EP#41
EU0018	Alternatives Chipper w/ Cyclone, EP#42
EU0019	Wine Head Toasters, EP#5
EU0020	Bourbon Head Char, EP#6
EU0021	Wine Barrel Toaster, EP#7
EU0022	Bourbon Barrel Char, EP#8
EU0023	Barrel Pre-Heater, EP#11
EU0024	Drum Heater, EP#24
EU0025	Electric Tank Stave Toaster (Pierre), EP#47

EU0026	Heine Boiler, EP#3
EU0027	Cleaver Brooks Boiler, EP#4
EU0028	Stave Toaster Wood Burner, EP#40
EU0029	Alternative Tank Stave Oven Propane Burner, EP#45
EU0030	Used Oil Burner, EP#50

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.

Description of Emission Source

Cyclone #1, EP#16
Transfer to Storage Bay from Closed Conveyance, EP#17
Unload Trailer to Storage Bay, EP#17
Chips to Pre-Heaters Transfer to Box from Storage Bay via FEL, EP#21
Transfer to Meter Bin No. 1 from Storage Bay via FEL, EP#23
Augers & Bucket Elevator Transfer to Drum Dryer, EP#24
Pneumatic Transfer to Chip Bagging from Hammermill, EP#25
Pneumatic Transfer to Bagging from Closed Conveyance, EP#25
Load Re grind Meter Bin via FEL, EP#31
Transport Sawdust with Front End Loader (Green Silo), EP#38
Loading Semi Trailer with Front End Loader, EP#39
Storage of Chipped Wood in Alternatives Bay (4), EP#43
Transfer Chipped Wood with Bucket Loader in Alternatives Bay, EP#44
Sweeping and Dumping Plant Waste into Trailer, EP#46
French Oak Block Building Shavings Storage, EP#48
French Oak Bucket Loader Transfer, EP#49
Bulk Bag Bagger (New Alternatives Bay), EP#52
Bucket Loader Transfer to Bulk Bag Loader, EP#53
Bulk Bag Meter Bin, EP#53
Chip Bulk Bag Fill, EP#53
Bulk Bag Unloader/Feeder Conveyor to Roaster, EP#53
Chip Overhead Feeder Belt to Roasters #2 and #3, EP#53
Chip Roaster Cooling Tables (2), EP#53
Cooling Table Takeaway Belt Conveyors to Bulk Bags, EP#53
Chip Roaster Bulk Bag Loadout, EP#53
2mm Belt Conveyor to Vibrating Screen, EP#54
2mm Vibrating Screener, EP#54
2mm Chip Conveyor (2), EP#54
2mm Chip Bags (2), EP#54
Heading Planers (4), EP#1
Heading Jointers (12), EP#1
Heading Turner-Hog, EP#1
Slicker Wheels (Cull Staves) (2), EP#1
Rip Saw (Cull Staves), EP#1
Wine Barrel Assembly Sanders (3), EP#1
Bourbon Barrel Assembly Sanders (5), EP#1

Bourbon Finish Sanders, EP#1
Bourbon Finish Rip Saw, EP#1
Wine Belly Sanders, EP#33
Wine Head Finish Sanders, EP#33
Wine Chime Sanders, EP#33
Crozier #2, EP#34
Transfer to Enclosed Building from Closed Conveyance, EP#35
Wine Barrel Laser, EP#36
Extract Sawdust from Green Silo and Dump on Ground, EP#37
Chip Roaster Cyclone Hopper, EP#53
Trash Dumpster for Cyclone Hopper, EP#53

DOCUMENTS INCORPORATED BY REFERENCE

This permit incorporates the following documents by reference:

Construction Permit No. 0995-014A, Issued September 5, 1995
Construction Permit No. 082006-007, Issued August 28, 2006
Construction Permit No. 052009-005, Issued May 11, 2009

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001

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

Emission Limitation:

The permittee shall not cause or allow the emission of particulate matter of a diameter of less than or equal to 10 microns (PM₁₀) in excess of 100 tons in any consecutive 12 month period.

Monitoring/Record Keeping:

1. The permittee shall maintain an accurate record of average monthly throughput for all emission units.
2. The monthly emissions of particulate matter of a diameter of less than 10 microns for each emission unit shall be calculated, using the average monthly throughput, emission factor, and control device efficiency.
3. The permittee shall calculate their annual emission of particulate matter of size 10 microns or less by summing the monthly emissions of each emission unit for the last twelve months. The annual emission will be calculated each month using the most recent twelve months worth of monthly emission totals.
4. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. If at any time the yearly emission limit of 100 tons should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65101, no later than fifteen (15) days after the exceedance.
2. The permittee shall report any deviations from the monitoring/recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION PW002

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

Emission Limitation:

The permittee shall not cause or allow the emission of nitrogen oxides (NO_x) in excess of 100 tons in any consecutive 12-month period.

Monitoring/Record Keeping:

1. The permittee shall maintain an accurate record of average monthly throughput for emission units: EU0001 and EU0019 through EU0030.

2. The monthly emissions of nitrogen oxides for each emission unit shall be calculated, using the average monthly throughput and emission factor.
3. The permittee shall calculate their annual emission of nitrogen oxides by summing the monthly emissions of each emission unit for the last twelve months. The annual emission will be calculated each month using the most recent twelve months worth of monthly emission totals.
4. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. If at any time the yearly emission limit of 100 tons should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65101, no later than fifteen (15) days after the exceedance.
2. The permittee shall report any deviations from the monitoring/recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION PW003

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

Emission Limitation:

The permittee shall not cause or allow the emission of carbon monoxide (CO) in excess of 100 tons in any consecutive 12-month period.

Monitoring/Record Keeping:

1. The permittee shall maintain an accurate record of average monthly throughput for all CO emission units: EU0001 and EU0019 through EU0030.
2. The monthly emissions of CO for each emission unit shall be calculated as demonstrated in Attachment C or an equivalent form generated by the permittee.
3. The permittee shall calculate their annual emission of CO by summing the monthly emissions of each emission unit for the last twelve months. The annual emission will be calculated each month using the most recent twelve months worth of monthly emission totals.
4. All records shall be kept for no less than five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. If at any time the yearly emission limit of 100 tons should be exceeded or a malfunction occur which could possibly cause exceedance the permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65101, no later than fifteen (15) days after the exceedance.
2. The permittee shall report any deviations from the monitoring/recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION PW004

10 CSR 10-6.060 Construction Permits Required
Construction Permit No. 0995-014, Issued September 5, 1995

Special Condition:

Special Condition No. 1: If in the opinion of the director, a continuing situation of demonstrated nuisance odors exists for the neighbors of the facility, the director may require the permittee to submit a corrective action plan adequate to timely and significantly mitigate the odors. The permittee shall implement any such plan immediately upon its approval by the director. Failure to either submit or implement such a plan shall be a violation of the permit.

PERMIT CONDITION PW005

10 CSR 10-6.060 Construction Permits Required
Construction Permit No. 0995-014, Issued September 5, 1995

Special Condition:

Special Condition No. 2: If in the opinion of the director, the presence of particulate matter in the ambient air exists in quantities and durations that directly or proximately cause or contribute to injury to human, plant, or animal life or health, or to property, or that unreasonably interferes with the enjoyment of life or the use of property, the director may require the permittee to submit a corrective action plan adequate to timely and significantly mitigate the emission of particulate matter. The permittee shall implement any such plan immediately upon its approval by the director. Failure to either submit or implement such a plan shall be a violation of the permit.

PERMIT CONDITION PW006

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 any visible emissions with an opacity greater than 20% from the following emission units:
 - EU0001 Propane Fired Chip Roasters (4), EP#51
 - EU0002 Stave Planers (3), EP#1
 - EU0004 Pneumatic Transfer to CD1 from CD10
 - EU0006 Trailer Loadout/Transfer, EP#15
 - EU0007 Pneumatic Transfer to Trailer from CD11, EP#15
 - EU0008 Hammermill #1/Rotex Screen Baghouse #5, EP#19
 - EU0009 Pneumatic Transfer to Cleaver Brooks Storage Silo from CD1, EP#27
 - EU0010 Pneumatic Transfer to Silo from CD6, EP#27
 - EU0011 Hammermill #2, EP#32
 - EU0012 Roaster Mechanical Tumbling of Wood, EP#53
 - EU0013 Alternatives Rip Saws, EP#41
 - EU0014 Alternatives Chop Saws, EP#41
 - EU0015 Alternatives Band Saw, EP#41
 - EU0016 Alternatives Planer, EP#41
 - EU0017 Alternatives Rip/Chop Saws, EP#41
 - EU0018 Alternatives Chipper w/ Cyclone, EP#42
 - EU0019 Wine Head Toasters, EP#5
 - EU0020 Bourbon Head Char, EP#6
 - EU0022 Bourbon Barrel Char, EP#8

- EU0023 Barrel Pre-Heater, EP#11
- EU0024 Drum Heater, EP#24
- EU0025 Electric Tank Stave Toaster (Pierre), EP#47
- EU0028 Stave Toaster Wood Burner, EP#40
- EU0029 Alternative Tank Stave Oven Propane Burner, EP#45
- EU0030 Used Oil Burner, EP#50
- Cyclone #1, EP#16
- Transfer to Storage Bay from Closed Conveyance, EP#17
- Unload Trailer to Storage Bay, EP#17
- Chips to Pre-Heaters Transfer to Box from Storage Bay via FEL, EP#21
- Transfer to Meter Bin No. 1 from Storage Bay via FEL, EP#23
- Augers & Bucket Elevator Transfer to Drum Dryer, EP#24
- Pneumatic Transfer to Chip Bagging from Hammermill, EP#25
- Pneumatic Transfer to Bagging from Closed Conveyance, EP#25
- Load Re grind Meter Bin via FEL, EP#31
- Transport Sawdust with Front End Loader (Green Silo), EP#38
- Loading Semi Trailer with Front End Loader, EP#39
- Storage of Chipped Wood in Alternatives Bay (4), EP#43
- Transfer Chipped Wood with Bucket Loader in Alternatives Bay, EP#44
- Sweeping and Dumping Plant Waste into Trailer, EP#46
- French Oak Block Building Shavings Storage, EP#48
- French Oak Bucket Loader Transfer, EP#49
- Bulk Bag Bagger (New Alternatives Bay), EP#52
- Bucket Loader Transfer to Bulk Bag Loader, EP#53
- Bulk Bag Meter Bin, EP#53
- Chip Bulk Bag Fill, EP#53
- Bulk Bag Unloader/Feeder Conveyor to Roaster, EP#53
- Chip Overhead Feeder Belt to Roasters #2 and #3, EP#53
- Chip Roaster Cooling Tables (2), EP#53
- Cooling Table Takeaway Belt Conveyors to Bulk Bags, EP#53
- Chip Roaster Bulk Bag Loadout, EP#53
- 2mm Belt Conveyor to Vibrating Screen, EP#54
- 2mm Vibrating Screener, EP#54
- 2mm Chip Conveyor (2), EP#54
- 2mm Chip Bags (2), EP#54
- Heading Planers (4), EP#1
- Heading Turner-Hog, EP#1
- Bourbon Finish Sanders, EP#1
- Bourbon Finish Rip Saw, EP#1
- Wine Belly Sanders, EP#33
- Wine Head Finish Sanders, EP#33
- Wine Chime Sanders, EP#33
- Transfer to Enclosed Building from Closed Conveyance, EP#35
- Wine Barrel Laser, EP#36

- Extract Sawdust from Green Silo and Dump on Ground, EP#37
 - Chip Roaster Cyclone Hopper, EP#53
 - Trash Dumpster for Cyclone Hopper, EP#53
2. No owner or other person shall cause or permit to be discharged into the atmosphere any visible emissions with an opacity greater than 40% from the following emission units:
 - EU0003 Stave Jointers (19), EP#1
 - EU0005 Pneumatic Transfer to Heine Fuel Bin from CD1, EP#2
 - EU0021 Wine Barrel Toaster, EP#7
 - EU0026 Heine Boiler, EP#3
 - EU0027 Cleaver Brooks Boiler, EP#4
 - Heading Jointers (12), EP#1
 - Slicker Wheels (Cull Staves) (2), EP#1
 - Rip Saw (Cull Staves), EP#1
 - Wine Barrel Assembly Sanders (3), EP#1
 - Bourbon Barrel Assembly Sanders (5), EP#1
 - Crozier #2, EP#34
 3. 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 sixty (60) minutes air contaminants with an opacity up to 60%.

Monitoring:

1. The permittee shall conduct opacity readings on every emission unit using the procedures contained in U.S. EPA Test Method 22. Readings are only required when an emission unit 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 when conducting Method 22 observations:
 - a) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
 - b) Observations must be made once every two weeks for a period of eight (8) weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
 - d) A Method 9 observation shall be conducted anytime a violation is noted during a Method 22 observation.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Record Keeping:

1. The permittee shall maintain records of all observation results (see Attachments D & E, or equivalent forms generated by the permittee), 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.
2. The permittee shall maintain records of all maintenance and any equipment malfunctions using Attachment G or an equivalent form generated by the permittee.

3. The permittee shall maintain records of any U.S. EPA Method 9 opacity test performed in accordance with this permit condition.
4. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
5. All records must be maintained for five (5) years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65101, no later than fifteen (15) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitation, monitoring, recordkeeping, and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

EU0001 through EU0012			
Emission Unit	Description	Manufacturer/Model #	2008 EIQ Reference #
EU0001	Propane Fired Chip Roasters (4)	Eclipse/ TJ050:TJ025	EP#51
EU0002	Stave Planers (3)	Weining	EP#1
EU0003	Stave Jointers (19)	-	EP#1
EU0004	Pneumatic Transfer to CD1 from CD10	-	-
EU0005	Pneumatic Transfer to Heine Fuel Bin from CD1	In-House	EP#2
EU0006	Trailer Loadout/Transfer	In-House	EP#15
EU0007	Pneumatic Transfer to Trailer from CD11	In-House	EP#15
EU0008	Hammermill #1/Rotex Screen Baghouse #5	-	EP#19
EU0009	Pneumatic Transfer to Cleaver Brooks Storage Silo from CD1	Parkersburg Tank Co.	EP#27
EU0010	Pneumatic Transfer to Silo from CD6	Parkersburg Tank Co.	EP#27
EU0011	Hammermill #2	Jacobson	EP#32
EU0012	Roaster Mechanical Tumbling of Wood	Probat/G240	EP#53

PERMIT CONDITION (EU0001 through EU0012) - 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 the limits given in the following table:

Emission Unit	Description	2008 EIQ Reference #	Particulate Matter Emission Limit (lb/h)
EU0001	Propane Fired Chip Roasters (4)	EP#51	1.11
EU0002	Stave Planers (3)	EP#1	22.03
EU0003	Stave Jointers (19)	EP#1	22.03
EU0004	Pneumatic Transfer to CD1 from CD10	-	10.72
EU0005	Pneumatic Transfer to Heine Fuel Bin from CD1	EP#2	10.55
EU0006	Trailer Loadout/Transfer	EP#15	8.21
EU0007	Pneumatic Transfer to Trailer from CD11	EP#15	8.21
EU0008	Hammermill #1/Rotex Screen Baghouse #5	EP#19	7.23
EU0009	Pneumatic Transfer to Cleaver Brooks Storage Silo from CD1	EP#27	11.23
EU0010	Pneumatic Transfer to Silo from CD6	EP#27	6.95
EU0011	Hammermill #2	EP#32	9.67
EU0012	Roaster Mechanical Tumbling of Wood	EP#53	3.14

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/Record Keeping

1. The permittee shall retain the potential to emit calculations in Attachment F which demonstrate that the above emission limitation will never be exceeded. No further record keeping shall be required to demonstrate compliance with the emission limitations.
2. The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be kept for a period of five (5) years.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65101, no later than fifteen (15) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.

PERMIT CONDITION EU0001-002

10 CSR 10-6.060 Construction Permits Required
Construction Permit No. 052009-005 Issued May 11, 2009

Operational Limitation:

1. Special Condition No. 3.A: The permittee shall control emissions from the four (4) chip roasters (EP#51) by using cyclones as specified in the permit application. The cyclones shall be in use at all times when the chip roasters are in operation.
2. Special Condition No. 3.B: The cyclones shall be operated and maintained in accordance with the manufacturer's specifications. The cyclone shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that Department of Natural Resources' employees may easily observe them.

Monitoring/Record Keeping:

1. Special Condition No. 3.C: The permittee shall maintain an operating and maintenance log (using Attachment G or an equivalent form generated by the permittee) for each of the cyclones that shall include the following:
 - a) Incidents of malfunction, with impacts on emissions, durations of events, probable causes and corrective actions.
 - b) Maintenance activities, with inspection schedule, repair actions and replacements.
2. All records shall be kept on-site for a minimum of five (5) years and made available to Missouri 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 65101, no later than fifteen (15) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the monitoring/recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

EU0013 through EU0018			
Emission Unit	Description	Manufacturer/Model #	2008 EIQ Reference #
EU0013	Alternatives Rip Saws	Diehl/MR90	EP#41
EU0014	Alternatives Chop Saws	Pistorius-Whirlwind	EP#41
EU0015	Alternatives Band Saw	Woodmizer/Multihead	EP#41
EU0016	Alternatives Planer	Weing/Profimat23B	EP#41
EU0017	Alternatives Rip/Chop Saws	Phoenix/PA10	EP#41
EU0018	Alternatives Chopper w/ Cyclone	Precision Husky/48	EP#42

PERMIT CONDITION (EU0013 through EU0018) - 001
10 CSR 10-6.060 Construction Permits Required
Construction Permit No. 082006-007 Issued August 28, 2006

Operational Limitation:

Special Condition No. 2.A: The fabric filter for the saws and the planer (EP#41) must be in use at all times when any of the equipment associated with the fabric filter is in operation. The fabric filter shall be operated and maintained in accordance with manufacturer's specifications.

Monitoring:

1. The fabric filters shall be inspected for holes, imperfections, proper installation, or other problems that could hinder the effectiveness of the system.
2. The system shall be inspected each shift before operation of the emission units.

Record Keeping:

1. The permittee shall maintain records of the inspections of the system when they occur.
 - a) All inspections, corrective actions, and instrument calibrations shall be recorded.
 - b) Attachment G contains a log including these record keeping requirements. This log, or an equivalent form created by the permittee, must be used to certify compliance with this permit condition.
2. All records shall be kept on-site for a minimum of five (5) years and made available to Missouri 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 65101, no later than fifteen (15) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the monitoring/recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION EU0018-002

10 CSR 10-6.060 Construction Permits Required
Construction Permit No. 082006-007 Issued August 28, 2006

Operational Limitation:

1. Special Condition No. 2.B: The cyclone for the chipper (EP#42) must be in use at all times when the chipper associated with the cyclone is in operation. The cyclone shall be operated and maintained in accordance with manufacturer's specifications.
2. The cyclone shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that Missouri Department of Natural Resources' employees may easily observe them.

Monitoring/Record Keeping:

1. The permittee shall maintain an operating and maintenance log (using Attachment G or an equivalent form generated by the permittee) for each of the cyclones that shall include the following:
 - a) Incidents of malfunction, with impacts on emissions, durations of events, probable causes and corrective actions.
 - b) Maintenance activities, with inspection schedule, repair actions and replacements.
2. All records shall be kept on-site for a minimum of five (5) years and made available to Missouri 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 65101, no later than fifteen (15) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the monitoring/recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

EU0019 through EU0030			
Emission Unit	Description	Manufacturer/Model #	2008 EIQ Reference #
EU0019	Wine Head Toasters	In-House	EP#5
EU0020	Bourbon Head Char	In-House	EP#6
EU0021	Wine Barrel Toaster	In-House	EP#7
EU0022	Bourbon Barrel Char	In-House	EP#8
EU0023	Barrel Pre-Heater #1	In-House	EP#11
EU0024	Drum Heater	Energex	EP#24
EU0025	Electric Tank Stave Toaster (Pierre)	In-House	EP#47
EU0026	Heine Boiler	Heine	EP#3
EU0027	Cleaver Brooks Boiler	Cleaver Brooks	EP#4
EU0028	Stave Toaster Wood Burner	In-House	EP#40
EU0029	Alternative Tank Stave Oven Propane Burner	Webster /JbiG-02-RM7895A-M.10-UL	EP#45
EU0030	Used Oil Burner	Reznor/235	EP#50

PERMIT CONDITION (EU0019 through EU0025) - 001
 10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

Emission Limitation:

1. No person shall cause or permit the emission into the atmosphere gases containing more than two thousand parts per million by volume (2000 ppmv) of sulfur dioxide or more than seventy milligrams per cubic meter (70 mg/cubic meter) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three (3)-hour time period from EU0021.
2. No person shall cause or permit the emission into the atmosphere gases containing more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide or more than thirty-five milligrams per cubic meter (35 mg/cubic meter) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three (3)-hour time period from EU0019, EU0020, and EU0022 through EU0025.
3. 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.

Monitoring/Recordkeeping:

1. The permittee shall retain the potential to emit calculations in Attachment I which demonstrate that the above emission limitation will never be exceeded. No further record keeping shall be required to demonstrate compliance with the emission limitations.
2. The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be kept for a period of five (5) years.

Reporting:

The permittee shall report any change of fuel type that causes an exceedance of the sulfur limitation to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, within ten days following the discovery of the exceedance.

PERMIT CONDITION (EU0026 through EU0028) - 001

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 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.

Monitoring/Recordkeeping:

1. The permittee shall retain the potential to emit calculations in Attachment I which demonstrate that the above emission limitation will never be exceeded. No further record keeping shall be required to demonstrate compliance with the emission limitations.
2. The calculation shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. All records shall be kept for a period of five (5) years.

Reporting:

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65101, no later than fifteen (15) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.

PERMIT CONDITION (EU0026 through EU0030) - 002

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

Emission Limitation:

1. The permittee shall not emit particulate matter in excess of 0.40 lb/MMBtu from existing emission units EU0026 and EU0027.
2. The permittee shall not emit particulate matter in excess of 0.60 lb/MMBtu from new emission units EU0028 through EU0030.

Record Keeping:

1. The permittee shall maintain an accurate record of throughput, emission factors and actual emissions of particulate matter emitted into the atmosphere from these emission units. Attachment H contains a log including these recordkeeping requirements. This log, or an equivalent log created by the permittee, must be used to certify compliance with this requirement.
2. All weekly, quarterly and annual inspections, corrective actions, and instrument calibration shall be recorded, using Attachment G or an equivalent form generated by the permittee.
3. Records may be kept in either written or electronic form.

4. These records shall be made available immediately for inspection to the Department of Natural Resources personnel upon request.
5. All records must be maintained for five (5) years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65101, no later than fifteen (15) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the monitoring/recordkeeping and reporting requirements of this permit condition in the annual monitoring report and compliance certification required by Section V of this permit.

IV. Core Permit Requirements

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

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(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

10 CSR 10-6.110 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.
- 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 10-6.045 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:
 1. 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;
 2. 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;
 3. 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
 4. St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - (B) Yard waste, with the following exceptions:
 1. Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 2. 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;

3. 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:
 - A. 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;
 - B. 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;
 - C. The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - D. 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
 4. 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) Independent Stave Co. 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 Independent Stave Co. 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 Record Keeping. 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 10-3.090 Restriction of Emission of Odors

This requirement is not federally enforceable.

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

10 CSR 10-6.080 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, §(5)(C)1 and §(6)(C)1.B Permit Duration

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

10 CSR 10-6.065, (5)(C)1 and §(6)(C)1.C General 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 monitoring required by the annual monitoring report and compliance certification no later than:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

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

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

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

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

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

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

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

None.

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

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

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

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

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

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

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

The application utilized in the preparation of this permit was signed by Mr. David Bollenbach, Plant Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible

person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

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

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

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

VI. Attachments

Attachments follow.

ATTACHMENT A
Plantwide PM₁₀ Potential to Emit

Emission Unit	MHDR (tons/h)	PM₁₀ Emission Factor (lb/ton)	Control Efficiency	PM₁₀ Emissions (tons/yr)
Stave Planers (3)	12.3	0.2	0.895	1.13
Stave Jointers (19)	12.3	0.2	0.895	1.13
Heading Planers (4)	1.36	0.2	0.895	0.13
Heading Jointers (12)	1.36	0.2	0.895	0.13
Heading Turner-Hog	1.36	0.2	0.895	0.13
Slicker Wheels (Cull Staves) (2)	0.63	0.2	0.895	0.06
Rip Saw (Cull Staves)	0.6	0.2	0.895	0.06
Wine Barrel Assembly Sanders (3)	0.4	0.2	0.895	0.04
Bourbon Barrel Assembly Sanders (5)	0.4	0.2	0.895	0.04
Bourbon Finish Sanders	0.35	0.2	0.895	0.03
Bourbon Finish Rip Saw	0.29	0.2	0.895	0.03
Pneumatic Transfer to CD1 from CD10	4.2	0.58	0.895	1.12
Pneumatic Transfer to Heine Fuel Bin from CD1	4.1	0.58	0.895	1.09
Trailer Loadout/Transfer	2.82	0.58	0.895	0.75
Pneumatic Transfer to Trailer from CD11	2.82	0.58	0.895	0.75
Transfer to Storage Bay from Closed Conveyance	2.33	1.2	0	12.25
Unload Trailer to Storage Bay	2.33	1.2	0	12.25
Hammermill #1/Rotex Screen Baghouse #5	2.33	0.2	0.895	0.21
Chips to Pre-Heaters Transfer to Box from Storage Bay via FEL	2.82	0.36	0	4.45
Transfer to Meter Bin No. 1 from Storage Bay via FEL	1	0.36	0	1.58
Augers & Bucket Elevator Transport to Drum Dryer	1	1.2	0	5.26
Pneumatic Transfer to Chip Bagging from Hammermill	1	0.58	0	2.54
Pneumatic Transfer to Bagging from Closed Conveyance	1	0.58	0	2.54
Pneumatic Transfer to Cleaver Brooks Storage Silo from CD1	4.5	0.58	0.895	1.20
Pneumatic Transfer to Silo from CD6	2.2	0.58	0.895	0.59
Bucket Loader Transfer-Regrind Meter Bin	3.6	0.36	0	5.68
Load Regrind Meter Bin via FEL	3.6	0.36	0	5.68
Hammermill #2	3.6	0.2	0.89	0.35
Wine Belly Sanders	0.16	0.2	0.89	0.02
Wine Head Finish Sanders	0.09	0.2	0.89	0.01
Wine Chime Sanders	0.03	0.2	0.89	0.00
Crozier #2	0.20625	0.2	0.89	0.02
Transfer to Enclosed Building from Closed Conveyance	1	1.2	0	5.26
Extract Sawdust from Green Silo and Dump on Ground	0.525	1.2	0	2.76
Transport Sawdust with Front End Loader (Green Silo)	0.525	0.36	0	0.83
Loading Semi Trailer with Front End Loader	0.525	0.36	0	0.83
Alternatives Rip Saws	0.75	0.2	0.81	0.12
Alternatives Chop Saws	0.75	0.2	0.81	0.12
Alternatives Band Saw	0.75	0.2	0.81	0.12
Alternatives Planer	0.75	0.2	0.81	0.12
Alternatives Rip/Chop Saws	0.75	0.2	0.81	0.12
Alternatives Chipper w/ Cyclone	0.75	0.2	0.891	0.07
Storage of Chipped Wood in Alternatives Bay (4)	1	0.58	0	2.54
Transfer Chipped Wood with Bucket Loader in Alternatives Bay	1	0.36	0	1.58
Sweeping and Dumping Plant Waste into Trailer	1	0.36	0	1.58
French Oak Planter Block Shavings Storage	0.8625	0.58	0	2.19
French Oak Bucket Loader Transfer	0.8625	0.36	0	1.36

ATTACHMENT A
Plantwide PM₁₀ Potential to Emit Continued

Bulk Bag Bagger (New Alternatives Bay)	1	0.36	0	1.58
Bucket Loader Transfer to Bulk Bag Loader	0.67	0.36	0	1.06
Bulk Bag Meter Bin	0.67	0.36	0	1.06
Chip Bulk Bag Fill	0.67	0.36	0	1.06
Bulk Bag Unloader/Feeder Conveyor to Roaster	0.67	0.36	0	1.06
Roaster Mechanical Tumbling of Wood	0.67	0.36	0.81	0.20
Chip Overhead Feeder Belt to Roasters #2 and #3	0.67	0.36	0	1.06
Chip Roaster Cooling Tables (2)	0.67	0.36	0	1.06
Cooling Table Takeaway Belt Conveyors to Bulk Bags	0.67	0.36	0	1.06
Chip Roaster Bulk Bag Loadout	0.67	0.36	0	1.06
Chip Roaster Cyclone Hopper	0.029	0.36	0	0.05
Trash Dumpster for Cyclone Hopper	0.029	0.36	0	0.05
2mm Belt Conveyor to Vibrating Screen	0.975	0.36	0	1.54
2mm Vibrating Screener	0.975	0.36	0	1.54
2mm Chip Conveyor (2)	0.975	0.36	0	1.54
2mm Chip Bags (2)	0.975	0.36	0	1.54
Emission Unit	MHDR (MMBtu/h)	PM ₁₀ Emission Factor (lbs/MMBtu)	Control Efficiency	PM ₁₀ Emissions (tons/yr)
Heine Boiler	25.87	0.36	0.57	17.54
Cleaver Brooks Boiler	18.48	0.36	0.9	2.91
Wine Head Toasters	1.41	0.36	0	2.22
Bourbon Head Char	4.05	0.36	0	6.39
Wine Barrel Toaster	11.62	0.36	0.5	9.16
Bourbon Barrel Char	5.81	0.36	0.5	4.58
Bourbon Barrel Char	7.98	0.0062826	0.5	0.11
Barrel Pre-Heater	6.69	0.36	0.5	5.27
Drum Heater	17.6	0.36	0.645	9.85
Drum Heater	1	0.0062826	0.645	0.01
Wine Barrel Laser	0.11	0.36	0	0.17
Stave Toaster Wood Burner	1.76	0.36	0	2.78
Alternative Tank Stave Oven Propane Burner	1	0.0062826	0	0.03
Electric Tank Stave Toaster (Pierre)	0.03	0.36	0	0.05
Used Oil Burner	0.24	0.26678964	0	0.28
Propane Fired Chip Roasters (4)	6.4	0.0062826	0.81	0.03
Total				158.67

- The facility cannot run at maximum design rate without exceeding the 100 tons/yr PM₁₀ limit of Plantwide Permit Condition PW001.
- The permittee needs to maintain accurate throughput records to show that they never exceed the 100 tons/yr PM₁₀ limit in any consecutive 12-month period.

ATTACHMENT B
 Plantwide NO_x Potential to Emit

Emission Unit	MHDR (MMBtu/h)	NO_x Emission Factor (lbs/MMBtu)	NO_x Emissions (tons/yr)
Heine Boiler	25.87	0.49	55.52
Cleaver Brooks Boiler	18.48	0.49	39.66
Wine Head Toasters	1.41	0.49	3.03
Bourbon Head Char	4.05	0.49	8.69
Wine Barrel Toaster	11.62	0.49	24.94
Bourbon Barrel Char	5.81	0.49	12.47
Bourbon Barrel Char	7.98	0.198949	6.95
Barrel Pre-Heater	6.69	0.49	14.36
Drum Heater	17.6	0.49	37.77
Drum Heater	1	0.198949	0.87
Wine Barrel Laser	0.11	0.49	0.24
Stave Toaster Wood Burner	1.76	0.49	3.78
Alternative Tank Stave Oven Propane Burner	1	0.198949	0.87
Electric Tank Stave Toaster (Pierre)	0.03	0.49	0.06
Used Oil Burner	0.24	0.115213	0.12
Propane Fired Chip Roasters (4)	6.4	0.198949	5.58
Total			214.91

- The facility cannot run at maximum design rate without exceeding the 100 tons/yr NO_x limit of Plantwide Permit Condition PW002.
- The permittee needs to maintain accurate throughput records to show that they never exceed the 100 tons/yr NO_x limit in any consecutive 12-month period.

ATTACHMENT C
 Plantwide CO Potential to Emit

Emission Unit	MHDR (MMBtu/h)	CO Emission Factor (lbs/MMBtu)	CO Emissions (tons/yr)
Heine Boiler	25.87	0.6	67.99
Cleaver Brooks Boiler	18.48	0.6	48.57
Wine Head Toasters	1.41	0.6	3.71
Bourbon Head Char	4.05	0.6	10.64
Wine Barrel Toaster	11.62	0.6	30.54
Bourbon Barrel Char	5.81	0.6	15.27
Bourbon Barrel Char	7.98	0.033507	1.17
Barrel Pre-Heater	6.69	0.6	17.58
Drum Heater	17.6	0.6	46.25
Drum Heater	1	0.033507	0.15
Wine Barrel Laser	0.11	0.6	0.29
Stave Toaster Wood Burner	1.76	0.6	4.63
Alternative Tank Stave Oven Propane Burner	1	0.033507	0.15
Electric Tank Stave Toaster (Pierre)	0.03	0.6	0.08
Used Oil Burner	0.24	0.015122	0.02
Propane Fired Chip Roasters (4)	6.4	0.033507	0.94
		Total	247.95

- The facility cannot run at maximum design rate without exceeding the 100 tons/yr CO limit of Plantwide Permit Condition PW003.
- The permittee needs to maintain accurate throughput records to show that they never exceed the 100 tons/yr CO limit in any consecutive 12-month period.

ATTACHMENT D
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 F
10 CSR 10-6.400 Compliance Demonstration

Maximum Allowable PM Emissions = $E \text{ (lb/hr)} = 4.1(P)^{0.67}$ if $P \leq 30 \text{ tons/hr}$
 = $E \text{ (lb/hr)} = 55(P)^{0.11} - 40$ if $P > 30 \text{ tons/hr}$

P = Process weight rate (tons/hr)

E = Allowable emission rate limit (lb/hr)

Potential PM Emission Rate =
MHDR(tons/hr) * Emission Factor(lb/ton) * (1 – Control Efficiency/100)

Potential PM Concentration=
 Potential PM Emission Rate (lb/h) * 7000 (gr/lb) / (stack flowrate (scf/min) * 60 (min/h))

Emission Unit	Description	2008 EIQ Reference Number	MHDR	PM Emission Factor (lb/ton)	Control Device Efficiency	Potential PM Emission Rate (lb/h)	PM Emission Limit (lb/h)	Potential PM Conc. (gr/scf)	PM Conc. Limit (gr/scf)
EU0001	Propane Fired Chip Roasters (4)	EP#51	6.4	0.0062826	0.81	0.01	1.11	0.001	0.3
EU0002	Stave Planers (3)	EP#1	12.3	0.2	0.895	0.26	22.03	0.001	0.3
EU0003	Stave Jointers (19)	EP#1	12.3	0.2	0.895	0.26	22.03	0.0004	0.3
EU0004	Pneumatic Transfer to CD1 from CD10	-	4.2	0.58	0.895	0.26	10.72	0.001	0.3
EU0005	Pneumatic Transfer to Heine Fuel Bin from CD1	EP#2	4.1	0.58	0.895	0.25	10.55	0.003	0.3
EU0006	Trailer Loadout/Transfer	EP#15	2.82	0.58	0.895	0.17	8.21	0.002	0.3
EU0007	Pneumatic Transfer to Trailer from CD11	EP#15	2.82	0.58	0.895	0.17	8.21	0.002	0.3
EU0008	Hammermill #1/Rotex Screen Baghouse #5	EP#19	2.33	0.2	0.895	0.05	7.23	0.0003	0.3
EU0010	Pneumatic Transfer to Silo from CD6	EP#27	2.2	0.58	0.895	0.13	6.95	0.02	0.3
EU0011	Hammermill #2	EP#32	3.6	0.2	0.89	0.08	9.67	0.002	0.3
EU0012	Roaster Mechanical Tumbling of Wood	EP#53	0.67	0.36	0.81	0.05	3.14	0.01	0.3

Every emission unit is in compliance for both the PM rate emission limit and PM concentration emission limit.

ATTACHMENT H
10 CSR 10-3.060 Compliance Demonstration

This attachment may be used to demonstrate that the listed emission units are in compliance with 10 CSR 10-3.060, *Restriction of Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*. Installation's Total Heat Input (Q) in MMBtu/hr:

Emission Unit	MHDR (MMBtu/h)	2008 EIQ Reference #
Heine Boiler	25.87	EP#3
Cleaver Brooks Boiler	18.48	EP#4
Wine Head Toasters	1.41	EP#5
Bourbon Head Char	4.05	EP#6
Wine Barrel Toaster	11.62	EP#7
Bourbon Barrel Char	5.81	EP#8
Bourbon Barrel Char	7.98	
Barrel Pre-Heater	6.69	EP#11
Drum Heater	17.6	EP#24
Drum Heater	1	
Stave Toaster Wood Burner	1.76	EP#40
Alternative Tank Stave Oven Propane Burner	1	EP#45
Electric Tank Stave Toaster (Pierre)	0.03	EP#47
Used Oil Burner	0.24	EP#50
Propane Fired Chip Roasters (4)	6.4	EP#51
Total Q	109.94	

Allowable particulate matter emission limitation for existing indirect heating sources having an intermediate capacity between 10 MMBtu and 10,000 MMBtu:

$$E = 0.9(Q)^{-0.174}$$

$$E = 0.9(109.94)^{-0.174} = 0.40 \text{ lb/MMBtu}$$

Emission Unit	Fuel	Emission Factor (lb/MMBtu)	Source	Emission Limit (lb/MMBtu)	Is the Emission Unit in compliance?
EU0026 Heine Boiler	Wood	0.36	FIRE	0.40	Yes
EU0027 Cleaver Brooks Boiler	Wood	0.36	FIRE	0.40	Yes

Emission Unit	Fuel	Emission Factor	Source	Emission Factor (lb/MMBtu)	Emission Limit (lb/MMBtu)	Is the Emission Unit in compliance?
EU0028 Stave Toaster	Wood	0.36 lb/MMBtu	FIRE	0.36	0.40	Yes
EU0029 Alternative Tank Stave Oven	Propane	0.60 lbs/1000gal	AP-42	0.006	0.40	Yes
EU0030 Used Oil Burner	Used Oil	37.05 lbs/1000gal	AP-42	0.27	0.40	Yes

These calculations are for boilers and burners with no control. The calculations show that no further monitoring or record keeping is necessary because the emission units' worst-case emissions are lower than the applicable limit. CAM is not applicable.

ATTACHMENT I
10 CSR 10-6.260 Compliance Demonstration

The emission limits for existing emission units are two thousand parts per million by volume (2000 ppmv) of sulfur dioxide and seventy milligrams per cubic meter (70 mg/cubic meter) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three (3)-hour time period .

The emission limits for new emission units are five hundred parts per million by volume (500 ppmv) of sulfur dioxide and thirty-five milligrams per cubic meter (35 mg/cubic meter) of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three (3)-hour time period .

Description	Fuel	SO ₂ Emission Factor (lb/MMBtu)	Potential SO ₂ Emission Rate (ppmv)	SO ₂ Emission Limit (ppmv)	Potential SO ₃ Concentration (mg/m ³)	SO ₃ Concentration Limit (mg/m ³)
Wine Head Toasters	Wood	0.025	16.30	500	-	35
Bourbon Head Char	Wood	0.025	16.30	500	-	35
Wine Barrel Toaster	Wood	0.025	16.30	2000	-	70
Bourbon Barrel Char	Wood	0.025	16.30	500	-	35
Barrel Pre-Heater	Wood	0.025	16.30	500	-	35
Drum Heater	Wood	0.025	16.30	500	-	35
Electric Tank Stave Toaster (Pierre)	Wood	0.025	16.30	500	-	35

Note: It is assumed that all SO₃ was converted to SO₂, therefore it is assumed that the facility emits SO₃ below the specified limit.

The emission limit for indirect heating emission units is eight (8) pounds of sulfur dioxide per million BTUs actual heat input averaged on any consecutive three hour time period.

Description	MHDR (MMBtu/h)	Fuel	SO ₂ Emission Factor (lb/MMBtu)	Potential SO ₂ Emission Rate (lb/h)	SO ₂ Emission Limit (lb/h)
Heine Boiler	25.87	Wood	0.025	0.64675	8
Cleaver Brooks Boiler	18.48	Wood	0.025	0.462	8
Stave Toaster	1.76	Wood	0.025	0.044	8

STATEMENT OF BASIS

Voluntary Limitations

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

Permit Reference Documents

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

- 1) Intermediate Operating Permit Application Renewal, received April 2, 2007;
- 2) Intermediate Operating Permit Application Amendment, received July 13, 2009;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

None.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

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

None.

New Source Performance Standards (NSPS) Applicability

None.

Maximum Available Control Technology (MACT) Applicability

None.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

None.

Other Regulatory Determinations

The opacity compliance plan submitted in response to NOV #10929SW is no longer effective, therefore, the facility is subject to the standard requirements of 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*.

The following table contains a current Potential to Emit for this facility:

Pollutant	Potential to Emit (tons/yr)
CO	247.9
HAPs	0.1
Pb	0.1
NO _x	214.9
PM ₁₀	158.7
SO _x	1.9
VOC	74.2

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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