INTERMEDIATE STATE PERMIT TO OPERATE

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

Intermediate Operating Permit Number: OP2018-082
Expiration Date: OCT 01 2023
Installation ID: 095-2177
Project Number: 2015-09-060

Installation Name and Address
International Paper Company
4343 Clary Blvd.
Kansas City, MO 64130
Jackson County

Parent Company's Name and Address
International Paper Company
6400 Poplar Avenue
Memphis, TN 38197

Installation Description:
International Paper's Kansas City facility produces printed and non-printed corrugated sheets. Emission sources include a Starch Silo, Starch Mixing System, Corrugation Station, six flexographic printing stations each with individual baghouses, and scrap collection. Process support operations include a natural gas fired boiler and a parts washer. The installation is a synthetic minor source of volatile organic compound (VOC) and hazardous air pollutants (HAPs).

OCT 01 2018
Effective Date
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I. Installation Equipment Listing

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

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Emission Unit #</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-03 (fugitive)</td>
<td>EU0003</td>
<td>Currogator Station</td>
</tr>
<tr>
<td>EP-02 (fugitive)</td>
<td>EU0002</td>
<td>Starch Mixing System</td>
</tr>
<tr>
<td>EP-05</td>
<td>EU0005A</td>
<td>Hogger</td>
</tr>
<tr>
<td>EP-05</td>
<td>EU0005B</td>
<td>Baler</td>
</tr>
<tr>
<td>EP-33 (fugitive)</td>
<td>EU0013</td>
<td>Parts Washer</td>
</tr>
<tr>
<td>EP-05</td>
<td>EU0005</td>
<td>Scrap Recycling System with Cyclone</td>
</tr>
<tr>
<td>EP-12</td>
<td>EU0004</td>
<td>Flexographic Printing Press #5-Martin Mini</td>
</tr>
<tr>
<td>EP-16</td>
<td>EU0004</td>
<td>Flexographic Printing Press #7-S&amp;S</td>
</tr>
<tr>
<td>EP-18</td>
<td>EU0012</td>
<td>Flexographic Printing Press #4-Bobst Martin</td>
</tr>
<tr>
<td>EP-19</td>
<td>EU0009</td>
<td>Starch Silo with Cartridge Filter System</td>
</tr>
<tr>
<td>EP-20</td>
<td>EU0004</td>
<td>Flexographic Printing Press #3-United</td>
</tr>
<tr>
<td>EP-21</td>
<td>EU0014</td>
<td>Flexographic Printing Press #8-LMC PP2-1025</td>
</tr>
<tr>
<td>EP-22</td>
<td>EU0015</td>
<td>Flexographic Printing Press #9-Ward 12000</td>
</tr>
</tbody>
</table>

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS
The following list provides a description of the equipment that does not have unit specific limitations at the time of permit issuance.

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Emission Unit #</th>
<th>Description of Emission Unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-30 (fugitive)</td>
<td>EU0030</td>
<td>Haul Roads 1,000 gallon storage tank for caustic</td>
</tr>
</tbody>
</table>
II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The plant wide conditions apply to all emission units at this installation. This section applies to regulations that apply on an entire-installation wide basis.

<table>
<thead>
<tr>
<th>Permit Condition PW 1493</th>
</tr>
</thead>
<tbody>
<tr>
<td>10 CSR 10-6.060 Construction Permits Required</td>
</tr>
<tr>
<td>Construction Permit 1493, Issued March 12, 2018</td>
</tr>
</tbody>
</table>

**Emission Limitations:**

1. The permittee shall emit less than 99.0 tons of volatile organic compounds (VOC) into the atmosphere in any consecutive 12-month period from emission units with the potential to emit VOCs. [Special Condition # 3.A.]

2. The permittee shall emit less than 10 tons of any individual and 25 tons of all hazardous air pollutants (HAPs) into the atmosphere in any consecutive 12-month period from emission units with the potential to emit HAPs. [Special Condition # 3.B.]

**Operational Limitations:**

1. The permittee shall keep all solvents and cleaning solutions that emit VOC or HAPs in sealed containers when not in use. [Special Condition # 5.A.]

2. The permittee shall provide and maintain suitable, easily read, permanent markings on all solvent and cleaning solution containers used with equipment. [Special Condition # 5.B.]

**Monitoring/Recordkeeping:**

1. The permittee shall maintain records of the monthly and consecutive 12-month total VOC emissions from emission units with the potential to emit VOCs.

2. The permittee shall maintain records of the monthly and consecutive 12-month individual and total HAP emissions from emission units with the potential to emit HAPs.

3. The permittee shall use Attachments VOC, Individual HAPs and Total HAPs, or equivalents, to demonstrate compliance with this permit condition.

4. The permittee shall maintain all records required by this permit for not less than five years and shall make them available to any Missouri Department of Natural Resources’ personnel upon request. These records shall include SDS for all materials used.

**Reporting:**

1. The permittee shall report any exceedance of the limitations, or any malfunction which could cause an exceedance the limitations, no later than ten days following the end of the month.

2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification.

3. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov and to the Kansas City Air Quality Program, 2400 Troost Avenue, Suite 3000, Kansas City, MO 64108.
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.

**Permit Condition 2.210**

10 CSR 10-2.210, Control of Emissions From Solvent Metal Cleaning

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-33</td>
<td>Parts Washer, 55 gallon capacity</td>
</tr>
</tbody>
</table>

**Operational Limitations:**

1. The permittee shall not use, sell, or offer for sale for use within Clay, Jackson, and Platte Counties a cold cleaning solvent with a vapor pressure greater than 1.0 mmHg (0.019 psi) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)) unless used for carburetor cleaning. [2.210(3)(A)1.A.]

2. The permittee shall not use, sell, or offer for sale for use within Clay, Jackson, and Platte Counties a cold cleaning solvent for the purpose of carburetor cleaning with a vapor pressure greater than 5.0 mmHg (0.097 psi) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)). [2.210(3)(A)1.B.]

3. The permittee with a cold cleaner may use an alternate method for reducing cold cleaning emissions if the permittee shows the level of emission control is equivalent to or greater than the requirements of 2.210(3)(A)1.A. and (3)(A)1.B. The alternate method must be approved by the director and the U.S. Environmental Protection Agency (EPA). [2.210(3)(A)1.C.]

4. The permittee shall equip each cold cleaner with a cover which prevents the escape of solvent vapors from the solvent bath while in the closed position or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner. [2.210(3)(A)1.D.]

5. When one or more of the following conditions exist, the permittee shall design the cover to operate easily such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten (10) square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems): [2.210(3)(A)1.E.]
   a) The solvent vapor pressure is greater than 0.3 psi measured at thirty-seven point eight degrees Celsius (37.8°C) (one hundred degrees Fahrenheit (100°F)). [2.210(3)(A)1.E.(I)]
   b) The solvent is agitated. [2.210(3)(A)1.E.(II)]
   c) The solvent is heated. [2.210(3)(A)1.E.(III)]

6. The permittee shall ensure each cold cleaner has an internal drainage facility so that parts are enclosed under the cover while draining. [2.210(3)(A)1.F.]

7. If an internal drainage facility cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measure at thirty-seven point eight degrees Celsius (37.8°C) (one hundred degrees Fahrenheit (100°F)), then the permittee shall equip the cold cleaner with an external drainage facility which provides for the solvent to drain back into the solvent bath. [2.210(3)(A)1.G.]

8. If the permittee uses solvent sprays, the sprays shall be a solid fluid stream (not a fine, atomized, or shower-type spray) and at a pressure which does not cause splashing above or beyond the freeboard. [2.210(3)(A)1.H.]
9. The permittee shall affix a permanent conspicuous label summarizing the operating procedures to the equipment or in a location readily visible during operation of the equipment. [2.210(3)(A)1.J.
10. The permittee of any cold cleaner that uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at thirty-seven point eight degrees Celsius (37.8°C) (one hundred degrees Fahrenheit (100°F)), or heated above forty-eight point nine degrees (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)) must use one of the following control devices: [2.210(3)(A)1.J.
   a) A freeboard ratio of at least 0.75; [2.210(3)(A)1.J.(I)]
   b) Water cover (solvent must be insoluble in and heavier than water); or [2.210(3)(A)1.J.(II)]
   c) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to sixty-five percent (65%). These control systems must receive approval from the director and EPA prior to their use. [2.210(3)(A)1.J.(III)]
11. The permittee shall ensure all cold cleaner covers are closed whenever parts are not being handled in the cleaners or the solvent must drain into an enclosed reservoir except when performing maintenance or collecting solvent samples. [2.210(3)(B)1.A.]
12. The permittee shall drain cleaned parts in the freeboard area for at least fifteen (15) seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping, or rotating, the parts shall be positioned so that the solvent drains directly back into the cold cleaner. [2.210(3)(B)1.B.]
13. Whenever a cold cleaner fails to perform within these regulatory operating requirements, the permittee shall shut down the unit immediately and the unit shall remain shutdown until operation is restored to meet these regulatory requirements. [2.210(3)(B)1.C.]
14. The permittee shall repair any solvent leaks immediately or the cold cleaner shall be shutdown until the leaks are repaired. [2.210(3)(B)1.D.]
15. The permittee shall dispose of any waste material removed from the cold cleaner by one (1) of the following methods or an equivalent method approved by the director and EPA: [2.210(3)(B)1.E.]
   a) Reduction of the waste material to less than twenty percent (20%) VOC solvent by distillation and proper disposal of the still bottom waste; or [2.210(3)(B)1.E.(I)]
   b) Stored in containers for transfer to- [2.210(3)(B)1.E.(II)]
      i. A contract reclamation service; or [2.210(3)(B)1.E.(II)(a)]
      ii. A disposal facility approved by the director and EPA. [2.210(3)(B)1.E.(II)(b)]
16. The permittee shall store waste solvent in closed containers only. [2.210(3)(B)1.F.]
17. Only persons trained in at least the operational and equipment requirements specified in this regulation for their particular solvent metal cleaning process shall be permitted to operate the equipment. [2.210(3)(C)1.]
18. Person who supervises any person who operates solvent cleaning equipment subject to this regulation shall receive equal or greater operational training that the operator. [2.210(3)(C)2.]
19. The permittee shall give a procedural review to all solvent metal cleaning equipment operators at least once each twelve (12) months. [2.210(3)(C)3.]

**Monitoring/Recordkeeping:**
1. The permittee shall keep records of all types and amounts of solvent containing waste material from cleaning or degreasing operations transferred to either a contract reclamation service or to a disposal facility. These records shall include maintenance and repair logs for both the degreaser and any associated control equipment. These records shall be kept current and made available for review on a monthly basis. The director may require additional recordkeeping if necessary to adequately demonstrate compliance with this regulation. [2.210(4)(A)]
2. To demonstrate compliance with the requirements of 2.210(3)(A)1.A. or 2.210(3)(A)1.B., the permittee shall maintain records which include for each purchase of cold cleaning solvent:
   a) The name and address of the solvent supplier; [2.210(4)(B)1.]
   b) The date of purchase; [2.210(4)(B)2.]
   c) The type of solvent; and [2.210(4)(B)3.]
   d) The vapor pressure of the solvent at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)). [2.210(4)(B)4.]

3. The permittee shall keep records of all solvent metal cleaning training required by 2.210(3)(C). [2.210(4)(D)]

4. The permittee shall use Attachments I/M Log and 2.210, or equivalents, to demonstrate compliance with this permit condition.

5. The permittee shall maintain all records required by this permit condition for a minimum of five (5) years and shall make these records available to department personnel upon request. [2.210(4)(E)]

**Reporting:**

1. The permittee shall report any exceedance of the limitations, or any malfunction which could cause an exceedance the limitations, no later than ten days following the end of the month.

2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification.

3. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov and to the Kansas City Air Quality Program, 2400 Troost Avenue, Suite 3000, Kansas City, MO 64108.

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**Permit Condition 1493**

10 CSR 10-6.060 Construction Permits Required

Construction Permit 1493, Issued March 12, 2018

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-19</td>
<td>Starch Silo with Cartridge Filter System, installed 2003</td>
</tr>
</tbody>
</table>

**Emission Limitations:**

1. The permittee shall emit less than 0.6 ton per year of acrylic acid (CAS 79-10-7) into the atmosphere in any consecutive 12-month period from the flexographic printing press #9. [Special Condition # 2.A.]

**Operational Limitations:**

1. The permittee shall keep replacement pleated filter cartridges for the Starch Silo bin vent on hand at all times. The permittee shall maintain the bin vent according to the manufacturer’s recommendations. [Special Condition # 4.A.]

2. The permittee shall control particulate emissions from the Starch Silo using the bin vent filter cartridges at all times the Starch Silo is in operation.
Monitoring/Recordkeeping:
1. The permittee shall inspect the bin vent semi-annually for proper operation. [Special Condition # 4.A.]
2. The permittee shall keep a copy of the bin vent manufacturer’s recommendations on site at all times.
3. The permittee shall maintain records of the monthly and consecutive 12-month total acrylic acid (CAS 79-10-7) emissions from the flexographic printing press #9.
4. The permittee shall use Attachments I/M Log and Individual HAPs, or equivalents, to demonstrate compliance with this permit condition.
5. The permittee shall maintain all records required by this permit for not less than five years and shall make them available to any Missouri Department of Natural Resources’ personnel upon request. These records shall include SDS for all materials used.

Reporting:
1. The permittee shall report any exceedance of the limitations within ten days following the end of the month.
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification.
3. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov and to the Kansas City Air Quality Program, 2400 Troost Avenue, Suite 3000, Kansas City, MO 64108.

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<tbody>
<tr>
<td>EP-19</td>
<td>Starch Silo with Cartridge Filter System, installed 2003</td>
</tr>
</tbody>
</table>

Emission Limitation:
1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission units any visible emissions with an opacity greater than 20 percent for any continuous six-minute period. [10 CSR 10-6.220(3)(A1)]
2. **Exception:** The permittee may discharge into the atmosphere from any emission unit visible emissions with an opacity up to 60 percent for one continuous six-minute period in any 60 minutes. [10 CSR 10-6.220(3)(A)2]

3. Failure to demonstrate compliance with 10 CSR 10-6.220(3)(A) solely because of the presence of uncombined water shall not be a violation. [10 CSR 10-6.220(3)(B)]

**Monitoring:**

1. Monitoring schedule:
   a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then:
      i. The permittee shall conduct observations once every two weeks for a period of eight weeks. If a violation is noted, the permittee shall revert to weekly monitoring. Should no violation of this regulation be observed during this period then:
         A. The permittee shall conduct observations once per month. If a violation is noted, the permittee shall revert to weekly monitoring.
   2. If the permittee reverts to weekly monitoring at any time, the monitoring schedule shall progress in an identical manner from the initial monitoring schedule.
   3. Observations are only required when the emission units are operating and when the weather conditions allow.
   4. Issuance of a new, amended, or modified operating permit does not restart the monitoring schedule.
   5. The permittee shall conduct visible emissions observation on these emission units using the procedures contained in U.S. EPA Test Method 22. Each Method 22 observation shall be conducted for a minimum of six-minutes. If no visible emissions are observed from the emission unit using Method 22, then no Method 9 is required for the emission unit.
   6. For emission units with visible emissions, the permittee shall have a certified Method 9 observer conduct a U.S. EPA Test Method 9 opacity observation. The permittee may choose to forego Method 22 observations and instead begin with a Method 9 opacity observation. The certified Method 9 observer shall conduct each Method 9 opacity observation for a minimum of 30-minutes.

**Recordkeeping:**

1. The permittee shall maintain records of all observation results for each emission unit using Attachments Method 22 and Method 9 or equivalent forms.
2. The permittee shall maintain all records required by this permit for not less than five years and shall make them available to any Missouri Department of Natural Resources’ personnel upon request.

**Reporting:**

1. The permittee shall submit a report no later than ten days following the end of the month.
2. The permittee shall report any deviations from the requirements of this permit condition in the annual compliance certification.
3. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov and to the Kansas City Air Quality Program, 2400 Troost Avenue, Suite 3000, Kansas City, MO 64108.
### Permit Condition 6.065

10 CSR 10-6.065, Operating Permits, Voluntary Limitation
10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-19</td>
<td>Starch Silo with Cartridge Filter System, installed 2003</td>
</tr>
</tbody>
</table>

**Operational Limitations:**

1. The permittee shall, at all times the emission point is in operation, control particulate emissions from equipment using the control devices as specified in the table above.
2. The permittee shall maintain the control devices according to the manufacturer’s recommendations.
3. The permittee shall keep replacement filters on hand at all times.

**Monitoring/Recordkeeping:**

1. The permittee shall keep an inspection, maintenance, and filter replacement log for each of the specified control devices. The permittee shall use Attachment I/M Log, or equivalent, to demonstrate compliance.
2. The permittee shall keep a copy of the manufacturer’s recommendations on site at all times for each of the specified control devices.
3. The permittee shall monitor the visible emissions from each of the specified control devices as detailed in Permit Condition 6.220.
4. The permittee shall maintain all records required by this permit for not less than five years and shall make them available to any Missouri Department of Natural Resources’ personnel upon request.

**Reporting:**

1. The permittee shall report any exceedance of the limitations within ten days following the end of the month.
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification.
3. All reports and certifications shall be submitted to the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov and to the Kansas City Air Quality Program, 2400 Troost Avenue, Suite 3000, Kansas City, MO 64108.
IV. Core Permit Requirements

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

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

1. General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.

2. Certain types of materials may be open burned provided an open burning permit is obtained from the director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.

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

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

2. The permittee shall submit the paragraph 1 information to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, notice shall be given as soon as practicable prior to the activity.

3. Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under section 643.080 or 643.151, RSMo.
4. Nothing in this rule shall be construed to limit the authority of the director or commission to take appropriate action, under sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.

5. Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

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

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall make such permit available to any Missouri Department of Natural Resources personnel upon request.


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

10 CSR 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information

1. The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.

2. Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.

3. The permittee shall submit full EIQ’s per the schedule in the rule. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation’s emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.

4. In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.
10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential
This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the director.

10 CSR 10-6.150 Circumvention
The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.165 Restriction of Emission of Odors
This is a State Only permit requirement.
No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

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

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

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants
1. The director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The director may specify testing methods to be used in accordance with good
professional practice. The director may observe the testing. All tests shall be performed by qualified personnel.

2. The director may conduct tests of emissions of air contaminants from any source. Upon request of the director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.

3. The director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

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

This is a State Only permit requirement.
The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

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

1. The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submitting compliance certificates:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Any other monitoring methods approved by the director.

2. Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred at an installation:
   a) Monitoring methods outlined in 40 CFR Part 64;
   b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and
   c) Compliance test methods specified in the rule cited as the authority for the emission limitations.

3. The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
   a) Applicable monitoring or testing methods, cited in:
      i) 10 CSR 10-6.030, “Sampling Methods for Air Pollution Sources”;
      ii) 10 CSR 10-6.040, “Reference Methods”;
      iii) 10 CSR 10-6.070, “New Source Performance Standards”;
      iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”; or
   b) Other testing, monitoring, or information gathering methods, if approved by the director, that produce information comparable to that produced by any method listed above.
40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

1. The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
   a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to 40 CFR §82.106.
   b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
   c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
   d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §82.112.

2. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B of 40 CFR Part 82:
   a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
   b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
   c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
   d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
   e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §82.156.
   f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR §82.166.

3. If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR part 82, Subpart A, Production and Consumption Controls.

4. If the permittee performs a service on motor (fleets) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements contained in 40 CFR part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

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

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

10 CSR 10-6.065, §(5)(C)1, §(6)(C)1.B, §(5)(E)2.C 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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

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 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, Compliance and Enforcement Section, P. O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov.

   b) The permittee shall submit a report of all required monitoring by:
      i) April 1st for monitoring which covers the January through December time period.
      ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.

   c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.

   d) Submit supplemental reports as required or as needed. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.

      i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (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.

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)l and §(6)(C)l.D Risk Management Plan Under Section 112(r)

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

### 10 CSR 10-6.065(5)(C)l.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)l.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, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102 or AirComplianceReporting@dnr.mo.gov. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
   a) The identification of each term or condition of the permit that is the basis of the certification;
   b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
   c) Whether compliance was continuous or intermittent;
   d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
   e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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 contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, or AirComplianceReporting@dnr.mo.gov as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
   c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

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

The application utilized in the preparation of this permit was signed by Troy Shipley, MPS Coordinator/EHS 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.
This permit may be reopened for cause if:

1. The Missouri Department of Natural Resources (MoDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,

2. Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
   a) The permit has a remaining term of less than three years;
   b) The effective date of the requirement is later than the date on which the permit is due to expire; or
   c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,

3. MoDNR or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

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 Method 22

#### Method 22 Visible Emissions Observations

<table>
<thead>
<tr>
<th>Installation Name</th>
<th>Observer Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>Location</td>
<td>Date</td>
</tr>
<tr>
<td>Sky Conditions</td>
<td>Wind Direction</td>
</tr>
<tr>
<td>Precipitation</td>
<td>Wind Speed</td>
</tr>
<tr>
<td>Time</td>
<td>Emission unit</td>
</tr>
</tbody>
</table>

Sketch emission unit: indicate observer position relative to emission unit; indicate potential emission points and/or actual emission points.

<table>
<thead>
<tr>
<th>Minute</th>
<th>Seconds</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0</td>
<td>15</td>
</tr>
<tr>
<td></td>
<td>Visible Emissions Yes (Y) or No (N)</td>
<td></td>
</tr>
</tbody>
</table>

If visible emissions are observed, the installation is not required to complete the entire six-minute observation. The installation shall note when the visible emissions were observed and shall conduct a Method 9 opacity observation.
## Attachment Method 9

### Method 9 Opacity Observations

<table>
<thead>
<tr>
<th>Installation Name:</th>
<th>Sketch of the observer’s position relative to the emission unit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission Point:</td>
<td></td>
</tr>
<tr>
<td>Emission Unit:</td>
<td></td>
</tr>
<tr>
<td>Observer Name and Affiliation:</td>
<td></td>
</tr>
<tr>
<td>Observer Certification Date:</td>
<td></td>
</tr>
<tr>
<td>Method 9 Observation Date:</td>
<td></td>
</tr>
<tr>
<td>Height of Emission Point:</td>
<td></td>
</tr>
<tr>
<td>Time:</td>
<td>Start of observations</td>
</tr>
<tr>
<td>Distance of Observer from Emission Point:</td>
<td></td>
</tr>
<tr>
<td>Observer Direction from Emission Point:</td>
<td></td>
</tr>
<tr>
<td>Approximate Wind Direction:</td>
<td></td>
</tr>
<tr>
<td>Estimated Wind Speed:</td>
<td></td>
</tr>
<tr>
<td>Ambient Temperature:</td>
<td></td>
</tr>
<tr>
<td>Description of Sky Conditions (Presence and color of clouds):</td>
<td></td>
</tr>
<tr>
<td>Plume Color:</td>
<td></td>
</tr>
<tr>
<td>Approximate Distance Plume is Visible from Emission Point:</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Minute</th>
<th>Seconds</th>
<th>1-minute Avg. % Opacity</th>
<th>6-minute Avg. % Opacity</th>
<th>Steam Plume (check if applicable)</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0</td>
<td></td>
<td></td>
<td>Attached</td>
<td></td>
</tr>
<tr>
<td></td>
<td>15</td>
<td></td>
<td></td>
<td>Detached</td>
<td></td>
</tr>
<tr>
<td></td>
<td>30</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>45</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Notes:**

1. 1-minute avg. % opacity is the average of the four 15 second opacity readings during the minute.
2. 6-minute avg. % opacity is the average of the six most recent 1-minute avg. % opacities.
3. Each 15 second opacity reading shall be recorded to the nearest 5% opacity as stated within Method 9.
The emission unit is in compliance if each six-minute average opacity is less than or equal to 20%. Exception: The emission unit is in compliance if one six-minute average opacity is greater than 20%, but less than 40%.

Was the emission unit in compliance at the time of evaluation (yes or no)?

Signature of Observer
Attachment Total HAPs

Table 1: Mass Balance Worksheet for Presses and Parts Washer

<table>
<thead>
<tr>
<th>A</th>
<th>B</th>
<th>C</th>
<th>D</th>
<th>E</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Used, (Name, HAP CAS #, Group)</td>
<td>Amount of Material Used (Include Units)</td>
<td>Density (lbs/gal)</td>
<td>HAP Content (Weight %)</td>
<td>HAP Emissions (Tons)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<tr>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

F. Total HAP Emissions from Mass Balance Materials (tons/month):

Table 2: Boiler

<table>
<thead>
<tr>
<th>G</th>
<th>H</th>
<th>I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monthly Natural Gas Usage (MMCF)</td>
<td>Total HAPs Emission Factor (lb/MMCF)</td>
<td>Monthly HAP Emissions (tons)</td>
</tr>
<tr>
<td></td>
<td></td>
<td>1.89</td>
</tr>
</tbody>
</table>

J. Total HAP Emissions from Combustion (tons/month):

4 Record the usage and units of the material.
5 Record the material density. If density is not provided, the permittee may calculate the density by using the specific gravity and the following equation:

\[
(specific\ gravity) \times (8.34\ lbs/gallon) = (density\ in\ lb/gallon)
\]
6 Record the HAP content from the SDS. If HAP content has a range, then use the highest value.
7 Calculate the HAP emissions by one of the following methods:
   i. If the usage is in tons (Column B) * (Column D) = Column E
   ii. If usage is in pounds (Column B) * (Column D) = Column E
   iii. If usage is in gallons (Column B) * (Column C) * (Column D) = Column E
8 Sum of Column E.
9 Plant wide usage of natural gas. This value may be taken from the utility bill or main plant meter.
10 Sourced from SCC 10200603.
11 Calculate the HAP emissions using the following equation: (Column G) * (Column H) = Column I
### Table 3: Calculation of total monthly HAPs and 12-month total HAPs

<table>
<thead>
<tr>
<th>Column</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>K.</td>
<td>K. Sum of Column F and J for this month (tons)(^{12}):</td>
</tr>
<tr>
<td>L.</td>
<td>L. SSM Emissions for this month (tons)(^{13}):</td>
</tr>
<tr>
<td>M.</td>
<td>M. Column O from previous month’s worksheet (tons)(^{14}):</td>
</tr>
<tr>
<td>N.</td>
<td>N. Column K from previous year’s worksheet (tons)(^{15}):</td>
</tr>
<tr>
<td>O.</td>
<td>O. Current 12-month Total of HAP Emissions (tons)(^{16}):</td>
</tr>
</tbody>
</table>

\(^{12}\) Sum of all HAP emissions for this month.

\(^{13}\) SSM emissions for this month, as reported to the Air Pollution Control Program’s Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050.

\(^{14}\) This value is carried forward from the previous month’s worksheet, and represents the 12 month total of HAP emissions as of the previous month.

\(^{15}\) This value is carried forward from the previous year’s worksheet, and represents the monthly HAP emissions for the same month in the previous year.

\(^{16}\) Current 12-month total HAP emissions. Calculated using the following equation: \((Column \, K) + (Column \, L) + (Column \, M) - (Column \, N) = Column \, O\). A total of less than 25 tons indicates compliance.
Attachment Individual HAPs

HAP Name or Group: ___________________________ CAS No.: ______________

Table 1: Emissions of individual HAPs

<table>
<thead>
<tr>
<th>A</th>
<th>B</th>
</tr>
</thead>
<tbody>
<tr>
<td>List materials that contain this HAP (Name or Group)</td>
<td>HAP emissions from Attachment A, Column E and Column J (tons)(^{17})</td>
</tr>
</tbody>
</table>

C. Total emissions for this HAP (tons/month)\(^{18}\):

Table 2: Calculation of monthly individual HAPs and 12 month individual HAPs

D. SSM Emissions for this month for this individual HAP (tons)\(^{19}\):

E. Column G from previous month’s worksheet (tons)\(^{20}\):

F. Column C from previous year’s worksheet (tons)\(^{21}\):

G. Current 12-month Total of individual HAP Emissions (tons)\(^{22}\):

---

\(^{17}\) In lieu of speciating the individual HAPs from natural gas combustion, the permittee may use the total HAPs emission factor from Attachment Total HAPs. These HAPs are then summed with the individual HAPs for all other processes.

\(^{18}\) Sum all emissions of this specific HAP.

\(^{19}\) SSM emissions for this month, as reported to the Air Pollution Control Program’s Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050.

\(^{20}\) This value is carried forward from the previous month’s worksheet, and represents the 12 month total of HAP emissions as of the previous month.

\(^{21}\) This value is carried forward from the previous year’s worksheet, and represents the monthly HAP emissions for the same month in the previous year.

\(^{22}\) Current 12-month individual HAP emissions. Calculated using the following equation: \((\text{Column C}) + (\text{Column D}) + (\text{Column E}) - (\text{Column F}) = \text{Column G}\). For HAPs that belong to an aggregate group, a total of less than 10 tons for the group indicates compliance. For HAPs that do not belong to an aggregate group, a total of less than 10 tons indicates compliance.
## Attachment VOC

### Table 1: Mass Balance Worksheet for Presses and Parts Washer

<table>
<thead>
<tr>
<th>A</th>
<th>B</th>
<th>C</th>
<th>D</th>
<th>E</th>
</tr>
</thead>
<tbody>
<tr>
<td>Material Used, (Name)</td>
<td>Amount of Material Used (Include Units)</td>
<td>Density (lbs/gal)</td>
<td>VOC Content (Weight %)</td>
<td>VOC Emissions (Tons)</td>
</tr>
</tbody>
</table>

F. Total VOC Emissions from Mass Balance Materials (tons/month):

### Table 2: Boiler

<table>
<thead>
<tr>
<th>G</th>
<th>H</th>
<th>I</th>
</tr>
</thead>
<tbody>
<tr>
<td>Monthly Natural Gas Usage (MMCF)</td>
<td>VOC Emission Factor (lb/MMCF)</td>
<td>Monthly VOC Emissions (tons)</td>
</tr>
<tr>
<td>5.5</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

J. Total VOC Emissions from Combustion (tons/month):

---

23 Record the name of each material used that contains a VOC as defined in 10 CSR 10-6.020.
24 Record the usage and units of the material.
25 Record the material density. If density is not provided, the permittee may calculate the density by using the specific gravity and the following equation:

\[(\text{specific gravity}) \times \left(\frac{8.34 \text{ lbs}}{\text{gallon}}\right) = (\text{density} \frac{\text{lb}}{\text{gallon}})\]

26 Record the VOC content from the SDS. If VOC content has a range, then use the highest value.
27 Calculate the VOC emissions by one of the following methods:
   i. If the usage is in tons \((\text{Column B}) \times (\text{Column D}) = \text{Column E}\)
   ii. If usage is in pounds \((\text{Column B}) \times \left(\frac{\text{Column D}}{2000}\right) = \text{Column E}\)
   iii. If usage is in gallons \((\text{Column B}) \times (\text{Column C}) \times \left(\frac{\text{Column D}}{2000}\right) = \text{Column E}\)
28 Sum of Column E.
29 Plant wide usage of natural gas. This value may be taken from the utility bill or main plant meter.
30 Sourced from SCC 10200603.
31 Calculate the VOC emissions using the following equation: \((\text{Column G}) \times \left(\frac{\text{Column H}}{2000}\right) = \text{Column I}\)
Attachment VOC (continued)

Table 3: Calculation of total monthly VOC and 12-month total VOCs

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td>K. Sum of Column F and J for this month (tons)(^{32}):</td>
<td></td>
</tr>
<tr>
<td>L. SSM Emissions for this month (tons)(^{33}):</td>
<td></td>
</tr>
<tr>
<td>M. Column O from previous month’s worksheet (tons)(^{34}):</td>
<td></td>
</tr>
<tr>
<td>N. Column K from previous year’s worksheet (tons)(^{35}):</td>
<td></td>
</tr>
<tr>
<td>O. Current 12-month Total of VOC Emissions (tons)(^{36}):</td>
<td></td>
</tr>
</tbody>
</table>

\(^{32}\) Sum of all VOC emissions for this month.

\(^{33}\) SSM emissions for this month, as reported to the Air Pollution Control Program’s Compliance/Enforcement Section according to the provisions of 10 CSR 10-6.050

\(^{34}\) This value is carried forward from the previous month’s worksheet, and represents the 12 month total of VOC emissions as of the previous month.

\(^{35}\) This value is carried forward from the previous year’s worksheet, and represents the monthly VOC emissions for the same month in the previous year.

\(^{36}\) Current 12-month total VOC emissions. Calculated using the following equation: \((Column\ K) + (Column\ L) + (Column\ M) - (Column\ N) = Column\ O\). A total of less than 99.0 tons indicates compliance.
### Attachment I/M Log

Emission Unit # ____________________________

<table>
<thead>
<tr>
<th>Date/Time</th>
<th>Inspection/ Maintenance Activities</th>
<th>Malfunction Activities</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Malfunction</td>
<td>Impact</td>
</tr>
<tr>
<td></td>
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</tr>
</tbody>
</table>
Attachment 2.210

Solvent Containing Waste Transfer Log

<table>
<thead>
<tr>
<th>Date</th>
<th>Amount of Total Solvent Transferred (gallons)</th>
<th>Amount of Solvent Transferred to a Contract Reclamation Service (gallons)</th>
<th>Amount of Solvent Transferred to a Disposal Facility (gallons)</th>
<th>Amount of Solvent Distilled on the Premises (gallons)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
</tr>
</tbody>
</table>

Purchase Records for Cold Cleaning Solvent

<table>
<thead>
<tr>
<th>Date</th>
<th>Solvent Supplier Name</th>
<th>Solvent Supplier Address</th>
<th>Type of Solvent</th>
<th>Solvent Volatility in mmHg at 20°C (68°F)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Employee Solvent Metal Cleaning Training Log

<table>
<thead>
<tr>
<th>Date</th>
<th>Title of Solvent Metal Cleaning Training Course</th>
<th>Instructor</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
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 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.

INSTALLATION DESCRIPTION
International Paper’s Kansas City facility produces printed and non-printed corrugated sheets. Emission sources include a Starch Silo, Starch Mixing System, Corrugation Station, six flexographic printing stations each with an individual baghouses, and scrap collection. Process support operations include a natural gas fired boiler and a parts washer. The reported emissions and potential to emit appear in Table 1.

The process begins with rolled liner board paper stock threaded into the Corrugation Station (EP-03). Starch, water, borax, sodium hydroxide, and resin adhesive are combined in the Starch Mixing System (EP-02). Starch is transported via a closed system from the Starch Silo with Cartridge Filter System (EP-19) to the Starch Hopper, and then to the Starch Mixing System (EP-02) to create glue. Glue is then applied to the paper stock, which has been corrugated (heated and formed into small folds), and glued to a top liner board.

After the top liner is attached, the bottom liner is attached, and the product becomes the corrugated web. The corrugated web is sent to the hot plate for curing. After curing, the sheet or container is cut to width and length, and either sent to shipping or transferred to the flexographic printing stations for further processing.

At the flexographic printing stations, the stock is cut and finished to meet customer specifications. One of the printing stations is also equipped with a die cutter which cuts the stock to the correct dimensions and shape. Presses along the process line form the creases on the flat sheets to allow for easy assembly by the customer.

Adhesive is then applied to the sheets to facilitate assembly, and the printing stations print customer-specified information onto the corrugated sheets. From the flexographic printing stations, the flat containers are packaged and shipped to the customer.

Scrap and clippings from the Corrugation Station (EP-03) and flexographic printing stations (EP-12, 16, 18, 20, 21, and 22) are transported via a pneumatic system to a Scrap Recycling System with Cyclone (EP-05). Processed material rejected for quality reasons and floor sweepings are transported to a hogger, which shreds the material prior to it being pneumatically transported to the Scrap Recycling System with Cyclone (EP-05). Scrap Recycling System with Cyclone (EP-05) controls the particulate emissions from the hogger. Material from the Scrap Recycling System with Cyclone (EP-05) is collected and baled, then sent off site for disposal.
### Table 1: Emissions Profile, tons per year

<table>
<thead>
<tr>
<th>Pollutants</th>
<th>Reported Emissions</th>
<th>Potential Emissions$^{37}$</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>2011/2012/2013$^{38}$</td>
<td>2014/2015/2016$^{39}$</td>
</tr>
<tr>
<td>Particulate Matter ≤ Ten Microns (PM_{10})</td>
<td>0.81</td>
<td>0.38</td>
</tr>
<tr>
<td>Particulate Matter ≤ 2.5 Microns (PM_{2.5})</td>
<td>0.22</td>
<td>0.37</td>
</tr>
<tr>
<td>Sulfur Oxides (SO_{x})</td>
<td>0.02</td>
<td>0.01</td>
</tr>
<tr>
<td>Nitrogen Oxides (NO_{x})</td>
<td>2.84</td>
<td>2.36</td>
</tr>
<tr>
<td>Volatile Organic Compounds (VOC)</td>
<td>0.35</td>
<td>0.29</td>
</tr>
<tr>
<td>Carbon Monoxide (CO)</td>
<td>2.38</td>
<td>1.98</td>
</tr>
<tr>
<td>Hazardous Air Pollutants (HAPs)</td>
<td>Not Reported$^{41}$</td>
<td></td>
</tr>
<tr>
<td>Ammonia (NH_{3})</td>
<td>0.01</td>
<td>0.01</td>
</tr>
</tbody>
</table>

### Equipment Changes Since Previous Operating Permit

The installation has made many changes to equipment since the previous permit, as detailed in Table 2.

### Table 2: Equipment Changes

<table>
<thead>
<tr>
<th>Emission Unit #</th>
<th>Description</th>
<th>Previous Operating Permit</th>
<th>This Operating Permit</th>
</tr>
</thead>
<tbody>
<tr>
<td>EU0001</td>
<td>Boiler #1 (EP01), combusts natural gas and #2 fuel oil</td>
<td>EP-01</td>
<td>Same unit, however fuel type is solely natural gas. The #2 fuel oil tank has been removed.</td>
</tr>
<tr>
<td>EU0002</td>
<td>Starch Mixing System</td>
<td>EP-02</td>
<td>Same system</td>
</tr>
<tr>
<td>EU0003</td>
<td>Currogator Station (EP03)</td>
<td>EP-03</td>
<td>Same unit</td>
</tr>
</tbody>
</table>

$^{37}$ Potential emissions have not been calculated for the installation. The particulate emissions from the lithographic printing presses has not been characterized. With the required control devices, it is anticipated that the potential to emit is less than the operating permit major source thresholds.

$^{38}$ The installation submitted a full EIQ for 2011 reporting year, and a reduced reporting form for reporting years 2012 and 2013, as allowed in 10 CSR 10-6.110.

$^{39}$ The installation submitted a full EIQ for 2014 reporting year, and a reduced reporting form for reporting years 2015 and 2016, as allowed in 10 CSR 10-6.110.

$^{40}$ The installation submitted a full EIQ for 2017 reporting year.

$^{41}$ The installation reports HAPs as PM or VOC as allowed by 10 CSR 10-6.110.
<table>
<thead>
<tr>
<th>Emission Unit #</th>
<th>Description</th>
<th>Emission Point #</th>
<th>Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-11</td>
<td>Removed</td>
<td></td>
<td></td>
</tr>
<tr>
<td>EP-13</td>
<td>Removed</td>
<td></td>
<td></td>
</tr>
<tr>
<td>EP-14</td>
<td>Removed</td>
<td></td>
<td></td>
</tr>
<tr>
<td>EU0005B</td>
<td>Hogger</td>
<td></td>
<td></td>
</tr>
<tr>
<td>EU0005B</td>
<td>Baler</td>
<td></td>
<td></td>
</tr>
<tr>
<td>EU0006</td>
<td>Rubber Die Adhesives Room (EP06)</td>
<td>None</td>
<td>According to the previous operating permit, these units were removed from site.</td>
</tr>
<tr>
<td>EU0007</td>
<td>Propane Gas Trucks, Mobile Sources (EP07)</td>
<td>None</td>
<td>Mobile sources are not included in operating permits.</td>
</tr>
<tr>
<td>EU0008</td>
<td>Underground Storage Tank #2 Fuel Oil</td>
<td>None</td>
<td>Tank has been removed from site.</td>
</tr>
<tr>
<td>EU0009</td>
<td>Starch Silo with Baghouse (EP19)</td>
<td>EP-19</td>
<td>Name change to clarify control device. Starch Silo with Cartridge Filter System</td>
</tr>
<tr>
<td>EU0013</td>
<td>Parts Washer</td>
<td>EP-33</td>
<td>Same unit</td>
</tr>
<tr>
<td>Previous Operating Permit</td>
<td>This Operating Permit</td>
<td></td>
<td></td>
</tr>
<tr>
<td>---------------------------</td>
<td>-----------------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Emission Unit #</td>
<td>Description</td>
<td>Emission Point #</td>
<td>Change</td>
</tr>
<tr>
<td>None</td>
<td>EP-30</td>
<td>EU0030 Haul Roads. No change to haul roads, EP assigned.</td>
<td></td>
</tr>
</tbody>
</table>

**Permit Reference Documents**

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

1. Intermediate Operating Permit Application, received September 25, 2015;
2. 2017 Emissions Inventory Questionnaire, received March 27, 2018;
4. webFIRE; and
5. All documents listed in Construction Permit History

**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.

See Other Regulatory Determinations

**Other Air Regulations Determined Not to Apply to the Operating Permit**

The Air Pollution Control Program has determined the following requirements to not be applicable to this installation at this time for the reasons stated.

See Other Regulatory Determinations

**Construction Permit History**

The following construction permits were issued to this installation:

1. Construction Permit 912
   This permit was issued by the Kansas City Health Department on March 21, 2000 to authorize construction of two die cutters with in-line flexographic printing presses. This permit was superseded by Construction Permit 1493.
2. Construction Permit 1017
   This permit was issued by the Kansas City Health Department on March 12, 2003 to authorize the construction of a 3-color flexographic printing machine and an automated starch mixing system. This permit was superseded by Construction Permit 1493.
3. Construction Permit 1270
   This permit was issued by the Kansas City Health Department on May 20, 2009 to authorize the construction of three flexographic printing presses. This permit was superseded by Construction Permit 1493.
4. No Permit Required Letter
This August 15, 2013 letter details the request to replace the Staley 66” x 80” diecutter and a Ward 66” x 100” diecutter with a Ward 66” x 120” diecutter. Kansas City Health Department determined this is a like kind replacement and therefore a construction permit is not required.

5. No Permit Required Letter
This December 18, 2017 letter details the request to replace the existing cyclone separator with a new cyclone separator. Kansas City Health Department determined this is a like kind replacement and therefore a construction permit is not required.

6. No Permit Required Letter
This December 18, 2017 letter details the request to replace a flexographic printing press. Kansas City Health Department determined this is a like kind replacement and therefore a construction permit is not required.

7. Construction Permit 1493
This permit was issued by the Kansas City Health Department on March 12, 2018 to authorize the construction of a flexographic printing press. This permit supersedes permits 912, 1017, and 1270. The plant wide special conditions of this permit appear in the operating permit as Permit Condition PW 1493, while the emission unit specific conditions appear as Permit Condition 1493.

New Source Performance Standards (NSPS) Applicability
40 CFR part 60 Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators
40 CFR part 60 Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978
40 CFR part 60 Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
40 CFR part 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

These regulations apply to steam generating units with the following parameters:

<table>
<thead>
<tr>
<th>Rule</th>
<th>Constructed/modified/reconstructed after....</th>
<th>Maximum design heat input capacity...</th>
</tr>
</thead>
<tbody>
<tr>
<td>D</td>
<td>August 17, 1971</td>
<td>greater than 250 MMBtu/hr</td>
</tr>
<tr>
<td>Da</td>
<td>September 18, 1978</td>
<td>greater than 250 MMBtu/hr</td>
</tr>
<tr>
<td>Db</td>
<td>June 19, 1984</td>
<td>greater than 100 MMBtu/hr</td>
</tr>
<tr>
<td>Dc</td>
<td>June 19, 1984</td>
<td>between 10 and 100 MMBtu/hr</td>
</tr>
</tbody>
</table>

Boiler #1 was constructed prior to 1984 and has not been modified or reconstructed. The boiler has a maximum hourly design rate of 14.645 MMBtu/hr, which is less than the applicability thresholds for Subparts D and Da. Therefore, none of these subparts apply to the installation.

40 CFR part 60 Subpart Kb, Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984
These regulations apply to storage vessels with the following parameters:

<table>
<thead>
<tr>
<th>Rule</th>
<th>Constructed/modified/reconstructed ....</th>
<th>With contents and capacities.....</th>
</tr>
</thead>
<tbody>
<tr>
<td>K</td>
<td>Between June 11, 1973 and May 19, 1978</td>
<td>Petroleum liquids, &gt;40,000 gallons</td>
</tr>
<tr>
<td>Ka</td>
<td>Between May 18, 1978 and July 23, 1984</td>
<td>Petroleum liquids, &gt;40,000 gallons</td>
</tr>
<tr>
<td>Kb</td>
<td>After July 23, 1984</td>
<td>Volatile organic liquids, &gt;19,813 gallons</td>
</tr>
</tbody>
</table>

The installation does not have storage vessels for petroleum liquids or volatile organic liquids, therefore none of these regulations apply.

40 CFR Part 60 Subpart IIII, Stationary Compression Ignition Internal Combustion Engines
This regulation applies to various CI RICE. This installation does not have any internal combustion engines, therefore this regulation does not apply.

40 CFR Part 60 Subpart JJJJ, Stationary Spark Ignition Internal Combustion Engines
This regulation applies to various SI RICE. This installation does not have any internal combustion engines, therefore this regulation does not apply.

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

40 CFR part 63 Subpart T, National Emission Standards for Halogenated Solvent Cleaning
The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. The concentration of these solvents may be determined using EPA test method 18, material safety data sheets, or engineering calculations. Wipe cleaning activities, such as using a rag containing halogenated solvent or a spray cleaner containing halogenated solvent are not covered under the provisions of this subpart.

The installation does not use the specified solvents in the parts washer (EP-33). Therefore, this regulation does not apply.

40 CFR part 63 Subpart KK, National Emission Standards for the Printing and Publishing Industry
This regulation contains provisions for both major and area sources of HAPs. Through the provisions of §63.820(a)(2), an installation may establish themselves as an area source, and subsequently comply with various recordkeeping and reporting provisions of the rule. Historically, the installation has complied with these provisions. However, this regulation also allows for installations to establish area source status by limiting the potential to emit via permitting. With the establishment of the 10/25 tons/year HAP limitations in the issued construction permits, the installation is classified as an area source according to the provisions of §63.820(a)(7) and is no longer subject to any provisions of this regulation.

This regulation applies to various RICE. This installation does not have any internal combustion engines, therefore this regulation does not apply.
40 CFR part 63 Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters
The provisions of this subpart apply to various industrial, commercial, or institutional boiler or process heaters located at major sources of HAPs. This installation is an area source of HAPs, therefore this regulation does not apply.

40 CFR part 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers Area Sources
The provisions of this subpart apply to various industrial, commercial, and institutional boilers located at an area source of HAPs. Boiler #1 combuts natural gas and therefore meets the criteria of §63.11195(e) and is not subject to this regulation.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability
40 CFR Part 61 Subpart M, National Emission Standard for Asbestos
This regulation applies to the installation and appears in the Core Permit Requirements section of the Operating Permit.

Greenhouse Gas Emissions
Note that this source may be subject to the Greenhouse Gas Reporting Rule. However, the preamble of the GHG Reporting Rule clarifies that Part 98 requirements do not have to be incorporated in operating permits at this time. In addition, Missouri regulations do not require the installation to report CO2 emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO2 emissions were not included within this permit. If required to report, the applicant is required to report the data directly to EPA. The public may obtain CO2 emissions data by visiting [http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html](http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html).

Other Regulatory Determinations
10 CSR 10-2.210, Control of Emissions From Solvent Metal Cleaning
This regulation applies to all installations that emit volatile organic compounds from solvent metal cleaning or degreasing operations. This regulation applies to the parts washer and appears as Permit Condition 2.210.

10 CSR 10-2.215, Control of Emissions From Solvent Cleanup Operations
This regulation applies to all installations that perform solvent cleaning operations using VOC containing solvents, at which solvent cleaning VOC emissions are greater than 500 pounds per day of VOC. The installation does not emit greater than 500 lbs VOC/day from cleaning solvents. Additionally, cold cleaners are exempt from this regulation per 2.215(1)(C)1. Therefore, this regulation does not apply.

10 CSR 10-2.230, Control of Emissions From Industrial Surface Coating Operations
This regulation applies to various industrial surface coating operations. Coating (as defined in 6.020) does not include inks used in printing operations regulated under 10 CSR 10-2.290 and 2.340. This installation uses flexographic printing presses to apply inks, which are regulated under 10 CSR 10-2.290, therefore this regulation does not apply.
10 CSR 10-2.290, Control of Emissions From Rotogravure and Flexographic Printing Facilities
This regulation applies to installations that have uncontrolled potential to emit greater than 250 kg/day or 100 tons/year of VOC from the combination of rotogravure and flexographic printing operations. Uncontrolled PTE is defined in this rule as the potential emissions (as defined in 10 CSR 10-6.020) plus the emissions that are prevented by control devices. This installation does not have any VOC control devices on the printing press operations, and the potential emissions (as defined in 10 CSR 10-6.020) are limited to less than 100 tons/year in this and previous operating permits. Therefore, this regulation does not apply.

10 CSR 10-6.170, Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin
This regulation applies to the installation and appears in the Core Permit Requirements. The pollutants of concern for this installation are VOCs and HAPs, therefore this permit does not contain any monitoring or recordkeeping requirements.

10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants
This regulation applies to all sources of visible emissions with specific exemptions. The applicability of this regulation is detailed in Table 3.

Table 3: 10 CSR 10-6.220 Applicability

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Unit Description</th>
<th>6.220 Applicability</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-01</td>
<td>Boiler #1, combusts natural gas.</td>
<td>Exempt per (1)(L) as a natural gas fired unit.</td>
</tr>
<tr>
<td>EP-02</td>
<td>Starch Mixing System</td>
<td>Exempt per (1)(O) as emitting only within a building space.</td>
</tr>
<tr>
<td>EP-03</td>
<td>Currogator Station</td>
<td>Not expected to emit visible emissions.</td>
</tr>
</tbody>
</table>
10 CSR 10-6.260, Restriction of Emission of Sulfur Compounds
This regulation was rescinded from the code of state regulations (CSR). However, this regulation is still contained in Missouri's State Implementation Plan (SIP). This regulation is a federally enforceable requirement until it is removed from the SIP, therefore it must appear in this Operating Permit.
Boiler #1 meets exemption (1)(A)2. as a natural gas fired unit. There are no other sulfur compound emission units on site, therefore this regulation does not apply.

10 CSR 10-6.261, Control of Sulfur Dioxide Emissions
This regulation applies to all sources of sulfur dioxide with specific exemptions.
Boiler #1 meets exemption (1)(A) as a natural gas fired unit. There are no other sulfur dioxide emission units on site, therefore this regulation does not apply.

10 CSR 10-6.400, Restriction of Emission of Particulate Matter From Industrial Processes
This regulation applies to all sources of particulate matter with specific exemptions. The applicability of this regulation is detailed in the table below.

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Unit Description</th>
<th>6.400 Applicability</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-01</td>
<td>Boiler #1, combuts natural gas.</td>
<td>Natural gas does not meet definition of process weight, rule does not apply.</td>
</tr>
<tr>
<td>EP-02</td>
<td>Starch Mixing System</td>
<td>Exempt per (1)(B)7. as a fugitive source.</td>
</tr>
<tr>
<td>EP-03</td>
<td>Currogator Station</td>
<td>Not expected to emit particulate matter.</td>
</tr>
<tr>
<td>EP-05</td>
<td>Scrap Recycling System with Cyclone. Installed December 18, 2017. MHDR=2.0 tons/hr.</td>
<td>Exempt per (1)(B)16, Emission Factor (SCC 30703001) = 1.0 lb PM/ton, Uncontrolled PTE = 2 lbs PM/hr, E = 6.52 lbs PM/hr.</td>
</tr>
<tr>
<td>EP-19</td>
<td>Starch Silo with Cartridge Filter System, installed 2003</td>
<td>Exempt per (1)(B)15 due to voluntary limitation.</td>
</tr>
</tbody>
</table>
### Emission Point Description

<table>
<thead>
<tr>
<th>Emission Point #</th>
<th>Unit Description</th>
<th>6.400 Applicability</th>
</tr>
</thead>
<tbody>
<tr>
<td>EP-33</td>
<td>Parts Washer</td>
<td>Not expected to emit particulate matter.</td>
</tr>
<tr>
<td>EP-30</td>
<td>Haul Roads</td>
<td>Exempt per (1)(B)7 as a fugitive source.</td>
</tr>
</tbody>
</table>

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

This regulation applies to all sources of particulate matter from indirect heating units with specific exemptions. Boiler #1 is a natural gas fired unit and is the only indirect heating source at the installation, therefore the installation meets exemption (1)(E) and this regulation does not apply.

**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).
Response to Public Comments

The draft Intermediate Operating Permit for International Paper Company was placed on public notice August 17, 2018 for a 30-day comment period. The public notice was published on the Department of Natural Resources’ Air Pollution Control Program’s web page at: https://dnr.mo.gov/env/apcp/permit-public-notices.htm. No public comments were received on the draft permit.
OCT 01 2018

Mr. Troy Shipley
International Paper Company
4343 Clary Blvd.
Kansas City, MO 64130

Re: International Paper Company, 095-2177
Permit Number: OP2018-082

Dear Mr. Shipley,

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

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at http://dnr.mo.gov/regions/. The online CAV request can be found at http://dnr.mo.gov/cav/compliance.htm.

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

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:nwj

Enclosures

c: PAMS File: 2015-09-060