



**Missouri Department of Natural Resources**  
**Air Pollution Control Program**

## **PART 70**

# **PERMIT TO OPERATE**

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

**Operating Permit Number:** OP2010-118  
**Expiration Date:** NOV 04 2015  
**Installation ID:** 125-0001  
**Project Number:** 2006-07-042

**Installation Name and Address**

Kingsford Manufacturing Company  
21200 Maries Road 314  
Belle, MO 65013  
Maries County

**Parent Company's Name and Address**

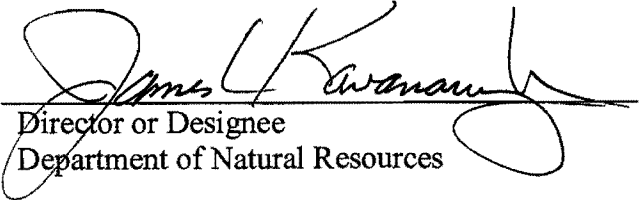
The Clorox Company  
P.O. Box 24305  
Oakland, CA 94623

**Installation Description:**

Kingsford Manufacturing Company (KMC) is a charcoal briquet manufacturing plant located in Belle, Missouri. Kingsford Manufacturing Company manufactures and packages Kingsford® brand charcoal briquets in several bag sizes at the Belle plant. The plant receives wood, which is processed in a wood dryer and retort furnace to produce char. The char is mixed with other additives including a starch binder and pressed into briquets. The briquets are then dried in three briquet dryers, cooled, and then stored in silos prior to bagging and packaging. The plant also operates a solvent treated briquet operation to produce the Matchlight® brand products.

NOV 05 2010

Effective Date

  
Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Kingsford Manufacturing Company (KMC) is a charcoal briquet manufacturing plant located in Belle, Missouri. Kingsford Manufacturing Company manufactures and packages Kingsford® brand charcoal briquets in several bag sizes at the Belle plant. The plant also operates a solvent treated briquet operation to produce the Matchlight® brand products.

Wet wood is first conveyed to a mixing chamber and then fed into the wood dryer drum. Upon drying, the sawdust is ducted to the wood dryer drop out box. The majority of the dry sawdust is then conveyed to the retort-charring furnace, which turns the sawdust into char, to make the briquets. The airborne portion of the sawdust exiting the wood dryer is fed to high efficiency cyclones; the captured particulate matter is conveyed to the retort-charring furnace. In the same manner, the airborne portion of the char exiting the retort-charring furnace is fed through high efficiency cyclones; the captured particulate matter is returned to the briquetting process. The air streams coming off of the cyclones are ducted to the after combustion chamber (ACC). The waste heat from the ACC is then used as the primary source of energy for the wood dryer drum. A portion of the waste heat is fed to the briquet drying process, as well.

Reported Air Pollutant Emissions									
Year	Particulate Matter ≤ Ten Microns (PM-10) (tons/yr)	Particulate Matter ≤ 2.5 Microns (PM-2.5) (tons/yr)	Sulfur Oxides (SO <sub>x</sub> ) (tons/yr)	Nitrogen Oxides (NO <sub>x</sub> ) (tons/yr)	Volatile Organic Compounds (VOC) (tons/yr)	Carbon Monoxide (CO) (tons/yr)	Lead (Pb) (lbs/yr)	Methanol (MeOH) (lbs/yr)	Hazardous Air Pollutants (HAPs) (tons/yr)
2009	114.11	111.51	13.92	99.13	46.30	20.40	29.1	288	0.16
2008	121.00	—	15.75	112.17	54.77	22.89	33.1	327	0.16
2007	120.76	—	28.31	184.79	52.14	17.74	25.1	355	0.18
2006	110.97	—	37.37	175.29	48.03	15.83	24.8	342	0.51
2005	117.03	70.72	37.75	178.88	51.40	17.12	25.1	518	0.51

The lead and methanol emission rates for calendar years 2005-2009 are from toxic release inventory (Form R) reports.

**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.

Emission Unit #	EIQ Reference #	Description of Emission Unit
EU0010	EP-4	After Combustion Chamber (ACC)
EU0020	EP-7	Raw Material Infeed
EU0030	EP-8	Bin Vent of 2 Char Silos
EU0040	EP-9	Bin Vent of 2 Silos – Char/Lignite
EU0050	EP-12A	Sawdust Silo/Pneumatic Conveyor
EU0051	EP-12B	Sawdust Sizing System
EU0070	EP-14	Bin Vent Briquetting Surge Bin
EU0080	EP-15	Bin Vent – Starch Silo
EU0120	EP-19	Boiler – Distillate Oil #2 (Waste Heat Recovery Boiler (WHRB))
EU0130	EP-23	Briquet Dryers
EU0140	EP-24	Briquet Transfer
EU0160	EP-26	Solvent Treated Briquet System
EU0170	EP-27	Dust Collector – Briquet Packaging
EU0180	EP-28	Briquet Cooling
EU0200	EP-30	Starch Conveying System
EU0210	EP-31	Nitrate Conveying System
EU0220	EP-32	Borax Conveying System
EU0230	EP-33	Minors Mixing/Metering
EU0240	EP-38	Bin Vent – Raw Material Silo #6
EU0250	EP-39	Bin Vent – Raw Material Silo #7
EU0260	EP-41	Pneumatic Raw Material Receiver with Filtered Baghouse Vent
EU0270	EP-10	Coal Unloading, Storage and Handling
EU0280	EP-34	Coal Hammer Mill
EU0290		80 HP Emergency Power Generator – No. 2 Fuel Oil
EU0300		240HP Caterpillar 3208T Fire Pump Engine No. 1 – No. 2 Fuel Oil
EU0310		240HP Caterpillar 3208T Fire Pump Engine No. 2 – No. 2 Fuel Oil

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### EMISSION UNITS WITHOUT LIMITATIONS

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

#### EIQ

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Reference #	Description of Emission Source
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EP-1	Truck Traffic Fugitive Dust
EP-2	Hog Fuel Unloading (fugitive) – Sawdust Pile Handling
EP-3	Hog Fuel Unloading (fugitive) – Sawdust Pile Handling
EP-6	Charcoal Unloading, Storage and Handling (fugitive)
EP-11	Lime Unloading, Storage and Handling (fugitive)
EP-12	Sawdust Unloading, Storage and Handling (fugitive)
EP-13	Blend Hammer Mill
EP-16	Nitrate Bag Handling to Hopper (process enclosed – 4 sided building)
EP-17	Borax Bag Handling to Hopper (process enclosed – 4 sided building)
EP-18	30,000 Gallon Diesel Fuel Storage Tank
EP-20	Mixing
EP-21	Convey to Briquet Roll Presses (process enclosed)
EP-22	Briquetting – Dual Briquet Roll Presses
EP-25	(3) 30,000 Gallon Briquet Solvent Pretreat Storage Tanks
EP-35	Mesquite Briquet Handling
EP-36	Ink for Packaging Bag Coders
EP-37	Parts Cleaning
	11 Maintenance Heaters – Kerosene
	Diesel Tank – Dozer Fuel
	Diesel Tank – Fire Pump No. 1
	Diesel Tank – Fire Pump No. 2
	Gasoline Tank – Vehicles
	Gasoline Tank – Equipment
	Diesel Tank – Equipment
	Used Oil Tank
	Make-up Fluid for Packaging Bag Coders
	Portable Vacuum Dust Collectors
	Packaging Central Vacuum System
	Packaging Bag Top Catcher
	QC Burn Ovens (used to test the quality of the charcoal briquets)

### DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Construction Permit Number 1189-010;
- 2) Construction Permit Number 0697-010A (Amendment to Permit No. 0697-010), Issued February 26, 2002;
- 3) Construction Permit Number 0699-003;
- 4) Construction Permit Number 1190-007;
- 5) Construction Permit Number 062003-012 & 062003-012A; and
- 6) Construction Permit Number 102005-008.

## II. Plant Wide Emission Limitations

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

### Permit Condition PW001

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

#### **Emission Limitation:**

- 1) The permittee shall not emit ten (10) tons or more of any individual Hazardous Air Pollutant (HAP) from the entire installation in any consecutive 12-month period.
- 2) The permittee shall not emit twenty-five (25) tons any combination of HAPs from the entire installation in any consecutive 12-month period.

#### **Monitoring/Recordkeeping:**

The permittee shall maintain an accurate record of emissions of HAPs emitted into the atmosphere from this installation. Example forms are attached as Attachments A and B. The permittee may use these forms, or forms of its own, so long as the forms used will accurately demonstrate compliance with the HAPs emission limitation (less than 10 tons in any consecutive 12-month period of any individual HAP or less than 25 tons in any consecutive 12-month period of any combination of HAPs).

#### **Reporting:**

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records required, as specified above, indicate that an emission limitation have been exceeded.

### Permit Condition PW002

10 CSR 10-6.060 Construction Permits Required  
Construction Permit Number 0697-010A

#### **Emission Limitation:**

All fuel oil fired at this facility shall contain less than 0.5% sulfur.  
[Construction Permit 0697-010A, Special Condition I-C]



### 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.

<b>EU0010 – After Combustion Chamber (ACC)</b>			
<b>EU0130 - Briquet Dryers</b>			
Emission Unit	Description	Manufacturer/Model #	2009 EIQ Reference #
EU0010	After Combustion Chamber (ACC)	<ul style="list-style-type: none"> <li>- ACC, Gillespie Power, Inc., ACC 84 feet tall by 10.5 diameter</li> <li>- Industrial Furnace Company, Multi-hearth Furnace, 5 Hearths</li> <li>- MEC 1272 Single Pass Sawdust Dryer</li> <li>- Two Fisher Klosterman, Inc., Cyclones on sawdust drying system, Model XQ170-47-1CR</li> <li>- Four Fisher Klosterman, Inc., Cyclones on Furnace system, Model XQ120-27-2.75CR</li> <li>- Six North American Low NO<sub>x</sub> Fuel Oil Burners (used for startups only (furnace)), Model 6421-7</li> <li>- Two North American Low NO<sub>x</sub> Fuel Oil Burners(installed on ACC for startup)</li> </ul>	EP-04
EU0130	Briquet Dryers	<ul style="list-style-type: none"> <li>- Dryer #1, Iron Mountain</li> <li>- Dryer #2, Iron Mountain</li> <li>- Dryer #3, Aeroglide</li> <li>- Low NOX North American Fuel Oil Burner</li> </ul>	EP-23

<b>Permit Condition EU0010-001 and EU0130-001</b>
10 CSR 10-6.060 Construction Permits Required Construction Permit Number: 0697-010A Construction Permit Number: 0699-003 40 CFR Part 64 Compliance Assurance Monitoring (CAM)

**Emission Limitation:**

- 1) The NO<sub>x</sub> emission rate, expressed as nitrogen dioxide (NO<sub>2</sub>), from the ACC and briquet dryers combined shall not exceed 77.9 pounds per hour and 13.0 pounds per ton of char produced. NO<sub>x</sub> concentration from the ACC and dryer exhaust shall not exceed 160 parts per million dry volumes (ppmdv) for all three (3) hour rolling averages. The ACC concentration shall be corrected to twelve percent (12%) carbon dioxide (CO<sub>2</sub>). [Construction Permit 0697-010A, Special Condition II-A]

- 2) The maximum particulate matter less ten microns (PM<sub>10</sub>) emission rates allowed from the ACC and briquet dryers combined are 36.73 pounds per hour and 6.12 pounds per ton of char produced. When the briquet dryers are down, the maximum ACC PM<sub>10</sub> emissions rates allowed are 38.15 pounds per hour and 6.36 pounds per ton of char produced. When the retort and ACC are down, the maximum briquet dryer PM<sub>10</sub> emission rate allowed is 7.38 pounds per hour. [Construction Permit 0697-010A, Special Condition II-B]
- 3) The opacity of the ACC stack exhaust shall not exceed ten percent (10%), as determined by Method 9 of Missouri State Rule 10 CSR 10-6.030 or by a Continuous Opacity Monitoring System (COMS). When the briquet dryers are down, the opacity of the ACC stack exhaust shall not exceed 12%, as determined by Method 9 or COMS. [Construction Permit 0697-010A, Special Condition II-C]
- 4) The opacity of dryer exhaust plumes shall not exceed five percent (5%), as determined by Method 9. [Construction Permit 0697-010A, Special Condition II-D]
- 5) Total organic carbon (TOC) emissions from the ACC and briquet dryers combined shall not exceed 15 parts per million dry volume (ppmdv). The ACC concentration shall be corrected to 12% CO<sub>2</sub>. [Construction Permit 0697-010A, Special Condition II-E & Construction Permit 0699-003, Special Condition 2]
- 6) To ensure continual adequate combustion, the carbon monoxide concentration in the ACC exhaust gas and in the briquet dryer exhaust gases shall not be greater than 50 ppmdv for all three (3) hour rolling averages. The ACC concentration shall be corrected to 12% CO<sub>2</sub>. [Construction Permit 0697-010A, Special Condition II-F]

**Operational Limitation/Equipment Specifications:**

- 1) The high efficiency cyclones shall be equipped with gauges or meters which indicate the pressure drop across them. The pressure drop across the cyclones shall be indicated in the same units as reported in the performance test report required below. The gauges or meters shall be located such that they may be easily observed by Missouri Department of Natural Resources' personnel. Failure to maintain the appropriate range of pressure drop shall result in the triggering of an alarm or other signal. The pressure drop across the cyclones shall be continuously recorded. The pressure drop shall not deviate by more than ten percent (10%) below the low end pressure drop figure in the range demonstrated during performance testing which shows compliance with emission limits. [Construction Permit 0697-010A, Special Condition I-A]
- 2) The pyrolysis of sawdust in the retort shall not occur prior to achieving a temperature of at least 1600°F (Fahrenheit) at or after the exit of the after combustion chamber (ACC) at a point that has been determined to be at least two (2) seconds downstream from the entrance of the ACC. [Construction Permit 0697-010A, Special Condition I-B]
- 3) Low oxides of nitrogen (NO<sub>x</sub>) burners shall be employed on the waste heat and recovery boiler and the duct burner. [Construction Permit 0697-010A, Special Condition I-D]
- 4) Exhaust gas shall not be vented out of the waste heat recovery boiler stack unless the briquet dryers are out of service. [Construction Permit 0697-010A, Special Condition I-E]

**Performance Testing:**

Kingsford shall conduct performance testing for PM, from both the ACC and briquette dryers in order to demonstrate compliance with Special Condition II B. Performance testing conditions shall be consistent with historical testing conducted by Kingsford and consistent with conditions set forth in Special Conditions 18, 23, 24, 25, 27 through 36 of Construction Permit No. 0697-010. This performance test for PM shall be conducted at least once every five (5) years, with the first test, for this revised schedule to be completed no later than 2006. [Construction Permit 0697-010A, Special Condition III-A]

**Monitoring:**

1) Continuous Monitoring Systems:

- a) A temperature continuous monitoring system shall be installed, calibrated, maintained and operated on the ACC. This system shall monitor and record the temperature of the exhaust gas at a point that has been determined to be a minimum of two (2) seconds downstream from the entrance of the ACC. Exhaust gas temperature shall be monitored to an accuracy of plus or minus two percent (+2%) of the temperature being measured in degrees Fahrenheit. The monitoring and recording system shall be subject to random audits.  
[Construction Permit 0697-010A, Special Condition IV-A]
- b) A carbon monoxide (CO) continuous emission monitoring and recording system shall be installed, calibrated, maintained and operated for measuring CO emissions discharged to the atmosphere from the ACC. This system shall monitor carbon monoxide and record carbon monoxide in ppm<sub>dv</sub> corrected to 12% CO<sub>2</sub>. This continuous emission monitoring system shall adhere to the monitoring requirements contained in §60.13 of 40 CFR Part 60 with the exception that all references to the “performance test(s) required under §60.8 of 40 CFR Part 60” shall mean the “performance test(s) required by this permit.” The CO continuous emission monitoring system shall be performance evaluated using the procedures and specifications referenced in 40 CFR Part 60, Appendix B, Performance Specification 4; and quality assured using the procedures referenced in 40 CFR Part 60, Appendix F. The monitoring and recording system shall be subject to random audits. [Construction Permit 0697-010A, Special Condition IV-B]
- c) A continuous opacity monitoring and recording system shall be installed, calibrated, maintained and operated for measuring the opacity of emissions discharged to the atmosphere from the ACC stack. This continuous opacity monitoring system shall adhere to the monitoring requirements contained in §60.13 of 40 CFR Part 60, with exception that all references to the “performance test(s) required under §60.8 of 40 CFR Part 60” shall mean the “performance test(s) required by permit.” The continuous opacity monitoring system shall be performance evaluated using the procedures and specifications referenced in 40 CFR Part 60, Appendix B, Performance Specification 1. After the initial performance evaluation it shall be performance evaluated at least once per year. The monitoring and recording system shall be subject to random audits.  
[Construction Permit 0697-010A, Special Condition IV-C]
- d) A nitrogen oxides continuous emission monitoring and recording system shall be installed, calibrated, maintained and operated for measuring nitrogen oxides emissions discharged to the atmosphere from the ACC. This continuous emission monitoring system shall adhere to the monitoring requirements contained in §60.13 of 40 CFR Part 60, with the exception that all references to the “performance test(s) required under §60.8” shall mean the “performance test(s) required by this permit.” The NO<sub>x</sub> continuous emission monitoring system shall be performance evaluated using the procedures and specification referenced in 40 CFR Part 60, Appendix B, Performance Specification 2; and quality assured using the procedures referenced in 40 CFR Part 60, Appendix F. The monitoring and recording shall be subject to random audits.  
[Construction Permit 0697-010A, Special Condition IV-D]
- e) A carbon dioxide (CO<sub>2</sub>) continuous emission monitoring and recording system shall be installed, calibrated, maintained and operated for the purpose of correcting carbon monoxide and nitrogen dioxide monitoring results from the ACC to 12% CO<sub>2</sub>. The CO<sub>2</sub> continuous emission monitoring shall adhere to the monitoring requirements contained in Section 60.13 of 40 CFR Part 60, with the exception that all references to the “performance test(s) required under Section 60.8 of 40 CFR Part 60” shall mean the “performance test(s) required by this permit.” The CO<sub>2</sub> continuous emission monitoring system shall be performance evaluated using the procedures and

specification referenced in 40 CFR Part 60, Appendix B, Performance Specification 3; and quality assured using the procedures referenced in 40 CFR Part 60, Appendix F. The monitoring and recording shall be subject to random audits. [Construction Permit 0697-010A, Special Condition IV-E]

- 2) *CAM Plan* - The permittee is subject to the CAM plan contained in Attachment C.
  - a) *CAM Compliance Indicators*: The following CAM Indicator shall be used to monitor the control device (ACC):
    - i) ACC temperature - ACC temperature shall be measured with a Type K thermocouple labeled TE-00701-01.
    - b) *CAM Compliance Indicator Range*: The indicator range is defined as a temperature equal to or greater than 1,700 degrees Fahrenheit (°F) based on a three-hour rolling average. An excursion is defined as a temperature less than 1,700 degrees Fahrenheit (°F) based on a three-hour rolling average. Kingsford Manufacturing Company shall conduct performance testing no later than June 30, 2011, that ultimately establishes the ongoing three-hour rolling average temperature indicator range/excursion level. The indicator range/excursion level shall then become that three-hour rolling average temperature that is successfully demonstrated to achieve compliance with the applicable PM, PM<sub>10</sub>, and VOC emission limits by Kingsford Manufacturing Company during the above-referenced performance testing
    - c) *Proper maintenance*: At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]
    - d) *Continued operation*: Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities, the permittee shall collect data at all required intervals when the emission unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of Part 64. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [40 CFR 64.7(c)]
    - e) *Response to excursions or exceedances*: [40 CFR 64.7(d)]
      - i) Upon detecting an exceedance, the permittee shall restore operation of the emission unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. [§64.7(d)(1)]

- ii) Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. [§64.7(d)(2)]

**Recordkeeping:**

- 1) Daily records of tons of char produced in the charcoal retort shall be kept. [Construction Permit 0697-010A, Special Condition V-A]
- 2) Records of the following shall be kept: performance tests; continuous temperature monitoring results; continuous pressure drop (across the high efficiency cyclone) monitoring results; and supplier certification of fuel oil sulfur content. [Construction Permit 0697-010A, Special Condition V-B]
- 3) Records of three (3) hour rolling average carbon monoxide concentrations, ppm<sub>dv</sub> corrected to 12% CO<sub>2</sub>, shall be kept. The dates and hours shall be noted in the records. [Construction Permit 0697-010A, Special Condition V-C]
- 4) Records of three (3) hour rolling average nitrogen oxides concentrations expressed as nitrogen dioxide ppm<sub>dv</sub> corrected to 12% CO<sub>2</sub>, shall be kept. The dates and hours shall be noted in the records. [Construction Permit 0697-010A, Special Condition V-D]
- 5) Records of six (6) minute average opacities of the ACC exhaust shall be kept. The dates and times shall be noted in the records. [Construction Permit 0697-010A, Special Condition V-E]
- 6) *CAM General Recordkeeping Requirements:*
  - a) The permittee shall comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). [40 CFR 64.9(b)(1)]
  - b) Instead of paper records, the permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements. [40 CFR 64.9(b)(2)]
- 7) Kingsford shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. [Construction Permit 0697-010A, Special Condition V-F]

**Reporting:**

- 1) Kingsford shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after the end of the month during which the records indicate that an emission limitations have been exceeded. [Construction Permit 0697-010A, Special Condition VI-A]
- 2) Kingsford shall submit a written report of excess opacity and excess nitrogen dioxide and carbon monoxide emissions for each calendar quarter and the nature and cause of the excess emissions, if known, to the Director. All quarterly reports shall be postmarked by the thirtieth day following the end of each calendar quarter. [Construction Permit 0697-010A, Special Condition VI-B]
- 3) For opacity, the data summary shall consist of the date, time and magnitude in actual percent opacity of all six (6) minute averages of opacity greater than the opacity emission limitation of 10% - 12%,

when briquet dryers are down. Averages of values may be obtained by arithmetically averaging a minimum of thirty-six (36) equally spaced instantaneous opacity measurements per six (6) minute period. [Construction Permit 0697-010A, Special Condition VI-C]

- 4) For nitrogen dioxide, the data summary shall consist of the date, time, and value in ppm<sub>dv</sub> corrected to 12% CO<sub>2</sub>, of all three (3) hour rolling averages in excess of the nitrogen dioxide concentration limit. [Construction Permit 0697-010A, Special Condition VI-D]
- 5) For carbon monoxide, the data summary shall consist of the date, time and value in ppm<sub>dv</sub> corrected to 12% CO<sub>2</sub>, of all three (3) hour rolling averages in excess of the carbon monoxide concentration limit. [Construction Permit 0697-010A, Special Condition VI-E]
- 6) The date and time identifying each period during which the continuous monitoring system was inoperative (except for zero and span checks) and the nature of system repairs or adjustments shall be reported. [Construction Permit 0697-010A, Special Condition VI-F]
- 7) When no excess emissions have occurred during the reporting period and the continuous monitoring system has not been inoperative, repaired or adjusted, this information shall be included in the report. [Construction Permit 0697-010A, Special Condition VI-G]
- 8) Kingsford shall maintain a file or information reported in the quarterly summaries and all other data collected either by the continuous monitoring system or as necessary to convert monitoring data to the units of the applicable standard, for a minimum of five (5) years from the date of collection of data or submission of summaries. [Construction Permit 0697-010A, Special Condition VI-H]
- 9) *CAM Reporting Requirements:*
  - a) The permittee shall submit semi--annual monitoring certified by a responsible official using the semi--annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III). The report shall include, at a minimum, the following information, as applicable: [40 CFR 64.9(a)(1) & (2)]
    - i) All instances of deviations from permit requirements must be clearly identified;
    - ii) Prompt reporting of deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken;
    - iii) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken; [40 CFR 64.9(a)(2)(i)]
    - iv) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and [CFR 64.9(a)(2)(ii)]
    - v) A description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring. [CFR 64.9(a)(2)(iii)]
  - b) *Documentation of need for improved monitoring:* If the permittee identifies a failure to achieve compliance with this permit condition for which the approved monitoring did not provide an indication of an exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Air Pollution Control Program and, if necessary, submit a proposed modification to the Part 70 permit to address the necessary

monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. [40 CFR 64.7(e)]

**Permit Condition EU0010-002 and EU0130-002**

10 CSR 10-6.060 Construction Permits Required

Construction Permit Number: 0697-010A

10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

**Emission Limitation:**

- 1) The sulfur dioxide (SO<sub>2</sub>) emission rate from the ACC and briquet dryers combined shall be less than 9.13 pounds per hour and 500 ppmdv, with compliance to be determined according to Missouri State Rule 10-6.260, *Restriction of Emission Sulfur Compounds*.  
[Construction Permit 0697-010A, Special Condition II-G]
- 2) Stack gasses shall not contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period. [10 CSR 10-6.260(3)(A)2.]
- 3) No person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards. [10 CSR 10-6.260(3)(B) & 10 CSR 10-6.010 Ambient Air Quality Standards]<sup>1</sup>

**Operational Limitation:**

All fuel oil fired at this facility shall contain less than 0.5% sulfur. Compliance with the fuel oil sulfur limit of 0.5% will assure compliance with the emission limitations of this permit condition.  
[Construction Permit 0697-010A, Special Condition I-C]

**Monitoring/Recordkeeping:**

The permittee shall maintain records of the fuel type used verifying a sulfur content no more than 0.5% by weight. Purchase receipts, analyzed samples or certifications of the sulfur content of the fuel will be acceptable. If this can not be accomplished then compliance to the emission limitations shall be determined by source testing and shall be accomplished as specified in 10 CSR 10-6.030(6) for sulfur dioxide emissions and 10 CSR 10-6.040 for measuring ambient sulfur compound concentrations. Other methods approved by the staff director in advance may be used.

**Reporting:**

The permittee shall report any deviations/exceedances of this permit condition using the semi--annual monitoring report and annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III).

<sup>1</sup> 10 CSR 10-6.260(3)(B) is state-only requirement.

**Permit Condition EU0010-003**

July 17, 2001 Consent Agreement

**Emission Limitation:**

“Pyrolysis” is not occurring during the Planned Retort Downtime (PRD) activities and Kingsford is not required to meet the 1600°F ACC permit limit or the CO limits from Construction Permit Number: 0697-010A during PRDs.

**Operating Parameters:**

- 1) The CEM system shall remain operational during this PRD activity.
- 2) The permittee shall develop a PRD procedure plan and implement the PRD activities according to the PRD procedure plan.
- 3) Duct maintenance shall be performed during the PRD activities with the emissions from this process being routed to the ACC.

**Monitoring:**

The permittee shall observe the PRD activities and note the time of day for the following activities: feed to the retort is shutoff, the initiation of PRD process (opening of ducts, etc.), sawdust feed to the furnace is re-initiated, and when the furnace reaches steady state and PRD ends.

**Recordkeeping:**

- 1) The permittee shall maintain records of the PRD activities. Attachment F or an equivalent form approved by the Air Pollution Control Program shall be used to record all information required by this settlement agreement.
- 2) The permittee shall code any exceedances during the PRD activities on the CEM reports as “PRD Activities” with a comment identifying what part of the PRD activity is occurring.
- 3) These records shall be kept for at least five (5) years and shall be made available to either the Director upon written request or Department inspection personnel upon verbal request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than fifteen (15) days after any exceedance of any of the terms imposed by this settlement agreement, or any malfunction which could possibly cause an exceedance of this settlement agreement.

<b>EU0020 - Raw Material Infeed EU0140 – Briquet transfer EU0170 – Briquet Packaging</b>		
Emission Unit	Description	2009 EIQ Reference #
EU0020	Raw Material Infeed with Pneumafil Dust Collector – Truck Dumping Operation	EP-07
EU0140	Briquet transfer to three silos of 20 feet diameter by 60 feet tall equipped with baghouse (CD-12) (Schust dust collector Model 13.5-316-8) Low NOX Gordon Piatt Burner, Model F16.1-0-150	EP-24
EU0170	Briquet Packaging Operation with a fabric filter dust collector-	EP-28



**Permit Condition EU0020-001, EU0140-001 and EU0170-001**

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

**Emission Limitation:**

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

**Monitoring:**

- 1) The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
  - a) Observations must be made once per month. If a violation is noted, then
  - b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then monitoring reverts to monthly monitoring.

**Record keeping:**

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

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

**Permit Condition EU0020-002, EU0140-002 and EU0170-002**

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes  
40 CFR Part 64 Compliance Assurance Monitoring (CAM)

**Emission Limitation:**

- 1) The permittee shall not emit particulate matter in excess of 42.53 lb/hr from EU0020, EU0140 and EU0170.
- 2) The permittee shall not emit particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic feet of exhaust gases.

Note: The emission rates in this permit condition apply to the sources individually and not the aggregated sources.

**Monitoring:**

- 1) The permittee is subject to the CAM plan contained in Attachment D.
- 2) *CAM Compliance Indicators:* The following CAM Indicators shall be used to monitor the control device (baghouse):
  - a) Visible Emissions
    - i) Visible emissions from the baghouse stack exhaust shall be monitored using EPA Reference Method 22-like procedures on a daily basis to ensure no visible emissions during the operation of this unit. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow.
  - b) Pressure Drop
    - i) The permittee shall check and document the baghouse pressure drop daily. The pressure drop across the baghouse shall be maintained within the range of 2.0 to 8.0 inches of water (H<sub>2</sub>O).
- 3) *CAM Compliance Indicator Range:* An excursion is defined as either the presence of visible emissions or as a pressure drop less than 2.0 in H<sub>2</sub>O or a pressure drop greater than 8.0 in H<sub>2</sub>O. a pressure drop outside of the normal operating range. An excursion of either indicator constitutes an excursion. If visible emissions are present when the pressure drop is within its specified indicator range and no baghouse problems are identified as the cause, the pressure drop indicator range shall be re-evaluated by Kingsford Manufacturing Company. Excursions trigger an inspection, corrective action, and a reporting requirement. If an excursion results in excess emissions exceeding one hour, Kingsford Manufacturing Company may elect to file a startup, shutdown, and malfunction assertion under 10 CSR 10-6.050 if appropriate to the situation. Corrective action to eliminate the visible emissions shall be initiated upon detection in accordance with Kingsford Manufacturing Company's attached procedures (Attachment E) entitled "Baghouse Excursion Corrective Action Procedure for EU0020, EU0140, & EU0170".
- 4) *Proper maintenance:* At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. [§64.7(b)]
- 5) *Continued operation:* Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities, the permittee shall collect data at all required intervals when the emission unit is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of Part 64. The permittee shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any

sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [§64.7(c)]

6) *Response to exceedances:* [§64.7(d)]

- a) Upon detecting an exceedance, the permittee shall restore operation of the emission unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. [§64.7(d)(1)]
- b) Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. [§64.7(d)(2)]

**Recordkeeping:**

- 1) *General Recordkeeping Requirements:* The permittee shall comply with the recordkeeping requirements specified in §70.6(a)(3)(ii). The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under Part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). [§64.9(b)(1)]
- 2) Instead of paper records, the permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements. [§64.9(b)(2)]
- 3) All records shall be maintained for five years.
- 4) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

**Reporting:**

- 1) *General Reporting Requirements:* The permittee shall submit semi--annual monitoring certified by a responsible official using the semi--annual monitoring report and annual compliance certification to the Air Pollution Control Program Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III). The report shall include, at a minimum, the following information, as applicable: [40 CFR 64.9(a)(1) & (2)]
  - a) All instances of deviations from permit requirements must be clearly identified;
  - b) Prompt reporting of deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken;
  - c) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken; [40 CFR 64.9(a)(2)(i)]

- d) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and [CFR 64.9(a)(2)(ii)]
  - e) A description of the actions taken to implement a QIP during the reporting period as specified in 40 CFR 64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring. [CFR 64.9(a)(2)(iii)].
- 2) *Documentation of need for improved monitoring:* If the permittee identifies a failure to achieve compliance with this permit condition for which the approved monitoring did not provide an indication of an exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Air Pollution Control Program and, if necessary, submit a proposed modification to the Part 70 permit to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. [§64.7(e)]
  - 3) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any deviations/exceedance of the Emission Limitation.

### **Permit Condition EU0020-003**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit Number: 102005-008

#### **Operational Limitation/Equipment Specifications:**

Kingsford Manufacturing Company-Belle, Missouri, shall control emissions from the truck dumping operation (EP-7) using fabric filters. [Construction Permit 102005-008, Special Condition 1]

- 1) The fabric filters shall be operated and maintained in accordance with the manufacturer's specifications. [Construction Permit 102005-008, Special Condition 1A]
- 2) The fabric filters shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them. Replacement filters for the fabric filter shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Construction Permit 102005-008, Special Condition 1B]
- 3) Kingsford Manufacturing Company-Belle, Missouri, shall monitor and record the operating pressure drop across the fabric filter at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Construction Permit 102005-008, Special Condition 1C]
- 4) Kingsford Manufacturing Company-Belle, Missouri, shall maintain an operating and maintenance log for the fabric filter which shall include the following: [Construction Permit 102005-008, Special Condition 1D]
  - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

<b>EU0030 through EU0040 - Char/Lignite Silos</b>		
<b>Emission Unit</b>	<b>Description</b>	<b>2009 EIQ Reference #</b>
EU0030	Char/Lignite Silos – bin vent for 2 char/lignite silos 20 feet diameter by 65 feet tall silos with fabric filter (CD-04)	EP-08
EU0040	Char/Lignite Silos – bin vent for 2 char/lignite silos 20 feet diameter by 65 feet tall silos with fabric filter (CD-05)	EP-09

**Permit Condition EU0030-001 through EU0040-001**  
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

**Emission Limitation:**

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

**Monitoring:**

- 1) The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
  - a) Observations must be made once per month. If a violation is noted, then
  - b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then monitoring reverts to monthly monitoring.

**Record keeping:**

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

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.

- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

**Permit Condition EU0030-002 through EU0040-002**

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes  
10 CSR 10-6.060 Construction Permits Required  
Construction Permit No.062003-012

**Emission Limitation:**

- 1) The permittee shall not emit particulate matter in excess of 40.88 lb/hr from EU0030 and EU0040.
- 2) The permittee shall not emit particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic feet of exhaust gases.

Note: The emission rates in this permit condition apply to the sources individually and not the aggregated sources.

**Operational Limitation/Equipment Specifications:**

Kingsford Manufacturing Company shall control emissions from the char/lignite silos using fabric filters as specified in the construction permit 062003-012 application. The fabric filters shall be operated and maintained in accordance with the manufacturer's specifications. The fabric filters shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them. Replacement filters for the fabric filters shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Construction Permit 062003-012, Special Condition 2A]

**Monitoring/Recordkeeping**

- 1) Kingsford Manufacturing Company shall monitor and record the operating pressure drop across the fabric filters at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.  
[Construction Permit 062003-012, Special Condition 2B]
- 2) Kingsford Manufacturing Company shall maintain an operating and maintenance log for the fabric filters which shall include the following: [Construction Permit 062003-012, Special Condition 2C]
  - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

**Reporting:**

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this permit condition.

**EU0050 through EU0051 -  
 Sawdust Silo/Pneumatic Conveyor and Sizing System**

Emission Unit	Description	2009 EIQ Reference #
EU0050	Sawdust Silo/Pneumatic Conveyor with fabric filter (CD-23)	EP-12A
EO0051	Sawdust Sizing system with Prater Model 45PRB pulse jet cartridge collector (CD-24)	EP-12B

**Permit Condition EU0050-001 through EU0051-001**

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

**Emission Limitation:**

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

**Monitoring:**

- 1) The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
  - a) Observations must be made once per month. If a violation is noted, then
  - b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then monitoring reverts to monthly monitoring.

**Record keeping:**

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

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.

- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

**Permit Condition EU0050-002 through EU0051-002**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit No.1189-010  
Construction Permit No.102005-008

**Emission Limitation:**

Kingsford Manufacturing Company shall not handle more than 8,000 tons of sawdust per year in the roller mill, conveying equipment, and sawdust feed tank. [Construction Permit 1189-010, Special Condition 1].

**Operational Limitation/Equipment Specifications:**

- 1) The monthly throughput of sawdust handled by the blend hammer mill shall be recorded and totaled on a consecutive twelve (12) month basis.
- 2) Kingsford Manufacturing Company-Belle, Missouri, shall control emissions from the sawdust silo/pneumatic conveyer (EP-12A) using fabric filters.  
[Construction Permit 102005-008, Special Condition 1]
  - a) The fabric filters shall be operated and maintained in accordance with the manufacturer's specifications. [Construction Permit 102005-008, Special Condition 1A]
  - b) The fabric filters shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the DNR employees may easily observe them. Replacement filters for the fabric filter shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Construction Permit 102005-008, Special Condition 1B]

**Monitoring/Recordkeeping**

- 1) The monthly throughput of sawdust handled by the blend hammer mill shall be recorded and totaled on a consecutive twelve (12) month basis. [Construction Permit 1189-010, Special Condition 2]
- 2) Kingsford Manufacturing Company-Belle, Missouri, shall monitor and record the operating pressure drop across the fabric filter at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.  
[Construction Permit 102005-008, Special Condition 1C]
- 3) Kingsford Manufacturing Company-Belle, Missouri, shall maintain an operating and maintenance log for the fabric filter which shall include the following:  
[Construction Permit 102005-008, Special Condition 1D]
  - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

**Reporting:**

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this permit condition.



<b>EU0070 – Briquetting Surge Bin EU0080 – Starch Silo</b>		
Emission Unit	Description	2009 EIQ Reference #
EU0070	Briquetting Surge Bin - bin vent for briquetting surge bin with fabric filter (CD-06)	EP-08
EU0080	Starch Silo – bin vent for starch silo with fabric filter (CD-07)	EP-09

**Permit Condition EU0070-001 through EU0080-001**  
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

**Emission Limitation:**

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

**Monitoring:**

- 1) The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
  - a) Observations must be made once per month. If a violation is noted, then
  - b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then monitoring reverts to monthly monitoring.

**Record keeping:**

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

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi--annually, in the semi--annual monitoring report and annual compliance certification, as required by Section V of this permit.

**Permit Condition EU0070-002**

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

**Emission Limitation:**

- 1) The permittee shall not emit particulate matter in excess of 40.52 lb/hr from EU0070.
- 2) The permittee shall not emit particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic feet of exhaust gases.

**Monitoring/Recordkeeping/Reporting:**

Not required (See Statement of Basis).

**Permit Condition EU0080-002**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit No.062003-012

**Operational Limitation/Equipment Specifications:**

- 1) Kingsford Manufacturing Company shall control emissions from the starch silo silos using fabric filters as specified in the construction permit 062003-012 application. The fabric filters shall be operated and maintained in accordance with the manufacturer's specifications. The fabric filters shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them. Replacement filters for the fabric filters shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).  
[Construction Permit 062003-012, Special Condition 2A]
- 2) Kingsford Manufacturing Company shall monitor and record the operating pressure drop across the fabric filters at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.  
[Construction Permit 062003-012, Special Condition 2B]
- 3) Kingsford Manufacturing Company shall maintain an operating and maintenance log for the fabric filters which shall include the following: [Construction Permit 062003-012, Special Condition 2C]
  - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

<b>EU0120 - Boiler</b>		
Emission Unit	Description	2009 EIQ Reference #
EU0120	16.8 MMBtu/hr Boiler – Distillate oil #2 diesel (waste heat recovery boiler (WHRB)). Constructed 1993. Superior Mohawk 3 Pass Boiler Model 4-WH-3502-5150 Low NOX Gordon Piatt Burner, Model F16.1-0-150	EP-19

<b>Permit Condition EU0120-001</b>
10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60 Subpart Dc Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

**Record Keeping:**

Standard for sulfur dioxide:

- 1) On and after the date on which the initial performance test is completed or required to be completed under §60.8 of 40 CFR Part 60, whichever date comes first, no owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO<sub>2</sub> in excess of 215 nanogram per joule (ng/J) (0.50 lb/million Btu) heat input; or, as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur. [§60.42c(d)]
- 2) For distillate oil-fired boilers, compliance with the emission limits or fuel oil sulfur limits may be determined based on a certification from the fuel supplier, as described under §60.48c(f)(1). [§60.42c(h) & (h)(1)]
- 3) The SO<sub>2</sub> emission limits and fuel oil sulfur limits apply at all times, including periods of startup, shutdown, and malfunction. [§60.42c(i)]

**Monitoring/Recordkeeping:**

Sulfur dioxide:

- 1) For distillate oil: Records of fuel supplier certification.
  - a) The Fuel Supplier Certification shall include the name of the oil supplier; and a statement from the oil supplier that the oil complies with the specifications for distillate oil (Distillate oil means fuel oil that complies with the specifications for Fuel Oil Nos. 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78, 89, 90, 92, 96, or 98 “Standard Specification of Fuel Oils”). [§60.48c(f)(1) & §60.41c – Definition]
  - b) The owner or operator of each affected facility shall record and maintain records of the amounts of each fuel combusted during each day. The owner or operator of an affected facility that only burns very low sulfur fuel oil or other liquid or gaseous fuels with potential sulfur dioxide emissions rate of 140 ng/J (0.32 lb/MMBtu) heat input or less shall record and maintain records of the fuels combusted during each calendar month.. [§60.48c(g)]
  - c) The permittee shall maintain all records required under §60.48c for a period of two (2) years following the date of such record. [§60.48c(i)]

**Reporting:**

The permittee shall submit records of fuel supplier certification with a certified statement signed by the owner or operator of the affected facility that the records of fuel supplier certification submitted represent all of the fuel combusted during the reporting period. The reporting period for the reports

required is each six-month period. All reports including calendar dates covered in the reporting period shall be submitted to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, by the 30th day following the end of the reporting period. [§60.48c(d), (e)(1), (e)(11) & (j)]

**Permit Condition EU0120-002**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit No. 0697-010A

**Operational Limitation/Equipment Specifications:**

- 1) Low oxides of nitrogen (NO<sub>x</sub>) burners shall be employed on the waste heat and recovery boiler and the duct burner. [Construction Permit 0697-010A, Special Condition I-D]
- 2) Exhaust gas shall not be vented out of the waste heat recovery boiler stack unless the briquet dryers are out of service. [Construction Permit 0697-010A, Special Condition I-E]

**EU0160 – Solvent Treated Briquet System**

Emission Unit	Description	2009 EIQ Reference #
EU0160	Solvent Treated Briquet System - The solvent treated briquet (STB) operations utilize a solvent curtain coater to apply solvent to charcoal briquets. Evaporative VOC losses from the curtain coater are exhausted to the ACC afterburner for VOC control.	EP-26

**Permit Condition EU0160-001**

10 CSR 10-6.060 Construction Permits Required  
Construction Permit No. 0699-003  
40 CFR Part 64 Compliance Assurance Monitoring (CAM)

**Emission Limitation:**

The Kingsford Manufacturing Company (Kingsford) shall emit into the atmosphere from the solvent treated briquet (STB) system (EP-26) less than 85 tons of volatile organic compounds (VOCs) in any consecutive 12-month period. This condition hereby supercedes the 87.5 tons per year of total organic compound (TOC) emissions specified in Construction Permit No. 0780-001. [Construction Permit 0699-003, Special Condition 1]

**Monitoring:**

*CAM Plan* - The permittee is subject to the CAM plan contained in Attachment C. The permittee shall comply with the CAM requirements stated in Permit Condition EU0010-001 and Permit Condition EU0130-001.

**Recordkeeping**

- 1) Records of monthly and annual VOC emissions from the STB system shall be kept on-site for the most recent 60 months. Attachment I, "VOC Compliance Worksheet," is suitable for this purpose. A form of the company's own design may be used instead of the attached form provided all the

requested information is logged. These records shall be made available immediately to the Department of Natural Resources' personnel upon verbal request. [Construction Permit 0699-003, Special Condition 4]

2) *CAM General Recordkeeping Requirements:*

The permittee shall comply with the CAM recordkeeping requirements specified in Permit Condition EU0010-001 and Permit Condition EU0130-001.

**Reporting:**

- 1) Kingsford shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of each month, if the 12-month cumulative total of VOCs records show that the source exceeded the limitation of 85 tons VOCs. [Construction Permit 0699-003, Special Condition 7]
- 2) *CAM Reporting Requirements:* The permittee shall comply with the CAM reporting requirements specified in Permit Condition EU0010-001 and Permit Condition EU0130-001

<b>EU0180 – Briquet Cooling</b>		
Emission Unit	Description	2009 EIQ Reference #
EU0180	Briquet Cooling	EP-28

<b>Permit Condition EU0180-001</b>
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

**Emission Limitation:**

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

**Monitoring:**

- 1) The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
  - a) Observations must be made once per month. If a violation is noted, then

- b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then monitoring reverts to monthly monitoring.

**Record keeping:**

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

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi--annual monitoring report and annual compliance certification, as required by Section V of this permit.

**Permit Condition EU0180-002**  
 10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes

**Emission Limitation:**

- 1) The permittee shall not emit particulate matter in excess of 40.52 lb/hr from EU0180.
- 2) The permittee shall not emit particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic feet of exhaust gases.

**Monitoring/Recordkeeping/Reporting:**

Not required (See Statement of Basis).

<b>EU0200 – Starch Conveying System                      EU0210 –Nitrate Conveying System                      EU0220 – Borax Conveying System                      EU0230 – Minors Mixing/Metering</b>		
Emission Unit	Description	2009 EIQ Reference #
EU0200	Starch conveying system with fabric filter (CD-15)	EP-30
EU0210	Nitrate conveying system with Micropulse 30 DS.2 wet scrubber (CD-20)	EP-31
EU0220	Borax conveying system (processed enclosed)	EP-32
EU0230	Minors mixing/metering system with Micropulse 30 DS.2 wet scrubber (CD-20)	EP-33

**Permit Condition EU0200-001 through EU0230-001**

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

**Emission Limitation:**

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

**Monitoring:**

- 1) The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
  - a) Observations must be made once per month. If a violation is noted, then
  - b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then monitoring reverts to monthly monitoring.

**Record keeping:**

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

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual monitoring report and annual compliance certification, as required by Section V of this permit.

**Permit Condition EU0200-002 and EU0210-002**

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

**Emission Limitation:**

- 1) The permittee shall not emit particulate matter in excess of 8.56 lb/hr from EU0200 and EU0210.
- 2) The permittee shall not emit particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic feet of exhaust gases.

Note: The emission rates in this permit condition apply to the sources individually and not the aggregated sources.

**Monitoring/Recordkeeping/Reporting:**

Not required (See Statement of Basis).

**EU0240 through EU0250 - Raw Material Silos  
 EU0260 – Pneumatic Raw Material Receiver**

Emission Unit	Description	2009 EIQ Reference #
EU0240	Raw Material Silo #6 with Mac fabric filter (CD-26)-	EP-38
EU0250	Raw Material Silo #7 with Mac fabric filter (CD-27)	EP-39
EU0260	Pneumatic Raw Material Receiver with Mac fabric filter (CD-28)	EP-41

**Permit Condition EU0240-001 through EU0260-001**

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

**Emission Limitation:**

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

**Monitoring:**

- 1) The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:



- a) Observations must be made once per month. If a violation is noted, then
- b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then monitoring reverts to monthly monitoring.

**Record keeping:**

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

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi--annual monitoring report and annual compliance certification, as required by Section V of this permit.

**Permit Condition EU0240-002 through EU0260-002**

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes  
10 CSR 10-6.060 Construction Permits Required  
Construction Permit No.062003-012

**Emission Limitation:**

- 1) The permittee shall not emit particulate matter in excess of 1.33 lb/hr from EU0240 through EU0260.
- 2) The permittee shall not emit particulate matter from any source in a concentration in excess of 0.30 grains per standard cubic feet of exhaust gases.

Note: The emission rates in this permit condition apply to the sources individually and not the aggregated sources.

**Operational Limitation/Equipment Specifications:**

Kingsford Manufacturing Company shall control emissions from the raw material silos (silo #6 and #7) and the pneumatic raw material receiver using fabric filters as specified in the construction permit 062003-012 application. The fabric filters shall be operated and maintained in accordance with the manufacturer's specifications. The fabric filters shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them. Replacement filters for the fabric filters shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance). [Construction Permit 062003-012, Special Condition 2A]

**Monitoring/Recordkeeping**

- 1) Kingsford Manufacturing Company shall monitor and record the operating pressure drop across the fabric filters at least once every 24 hours. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty. [Construction Permit 062003-012, Special Condition 2B]
- 2) Kingsford Manufacturing Company shall maintain an operating and maintenance log for the fabric filters which shall include the following: [Construction Permit 062003-012, Special Condition 2C]
  - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

**Reporting:**

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this permit condition.

<b>EU0270 through EU0280 - Coal/Lignite Processing, Conveying, Handling and Crushing</b>		
<b>Emission Unit</b>	<b>Description</b>	<b>2009 EIQ Reference #</b>
EU0270	Coal Unloading, Storage and Handling	EP-10
EU0280	Coal Hammer Mil – Coal crushing	EP-34

**Permit Condition EU0270-001 through EU0280-001**

10 CSR 10-6.070 New Source Performance Regulations  
40 CFR Part 60 Subpart Y Standards of Performance for Coal Preparation Plants

**Emission Limitation:**

On and after the date on which the performance test required to be conducted by §60.8 is completed, an owner or operator subject to the provisions of this subpart shall not cause to be discharged into the atmosphere from any coal processing and conveying equipment, coal storage system, or coal transfer and loading system processing coal, gases which exhibit 20 percent opacity or greater. [§60.252(c)]

**Monitoring:**

- 1) The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The following monitoring schedule must be maintained:
  - a) Monthly observations shall be conducted for a minimum of eight consecutive months after permit issuance. Should no violation of this regulation be observed during this period then-

- b) Observations must be made once every two (2) months for a period of eight months. If a violation is noted, monitoring reverts to monthly. Should no violation of this regulation be observed during this period then-
- c) Observations must be made semi--annually (i.e., once per reporting period). Observation shall be conducted during the January-June reporting period and during the July-December reporting period. If a violation is noted, monitoring reverts to monthly.
- 3) If the source reverts to monthly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

**Record Keeping:**

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

**Reporting:**

- 1) The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi--annual monitoring report and annual compliance certification, as required by Section V of this permit.

<b>EU0290 – Diesel Fired Emergency Generator EU0300 and EU310 – Fire Pump Engines</b>		
Emission Unit	Description	2009 EIQ Reference #
EU0290	80 HP Emergency Power Generator – No. 2 Fuel Oil	Not Available
EU0300	240HP Caterpillar 3208T Fire Pump Engine No. 1 – No. 2 Fuel Oil	
EU0310	240HP Caterpillar 3208T Fire Pump Engine No. 1 – No. 2 Fuel Oil	

<b>Permit Condition EU0290-001 through EU0310-001</b>
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

*You must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. [§63.6595(a)]*

**Emission Limitation:**

Owners or operators of an existing stationary CI RICE located at an area source of HAP emissions must comply with the requirements in Table 2d to Subpart ZZZZ of Part 63 which apply to you. [§63.6603(a)]

For each .....	You must meet the following requirement, except during periods of startup	During periods of startup you must
1. Non-Emergency CI $\leq$ 300 HP	a. Change oil and filter every 1,000 hours of operation or annually, whichever comes first; <sup>1</sup> b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; c. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first;	
2. Emergency CI <sup>2</sup>	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; <sup>1</sup> b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; and c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary	Minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply.

<sup>1</sup> Sources have the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2d of this subpart.

<sup>2</sup> If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of this subpart, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. Sources must report any failure to perform the management practice on the schedule required and the Federal, State or local law under which the risk was deemed unacceptable.

**Monitoring, Operation and Maintenance Requirements:**

- 1) If you own or operate an existing stationary emergency RICE, or an existing stationary RICE located at an area source of HAP emissions not subject to any numerical emission standards shown in Table 2d to Subpart ZZZZ of Part 63, you must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)]
- 2) If you own or operate an existing emergency stationary RICE located at an area source of HAP emissions, you must install a non-resettable hour meter if one is not already installed. [§63.6625(f)]
- 3) If you operate a new or existing stationary engine, you must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe

loading of the engine, not to exceed 30 minutes, after which time the emission standards applicable to all times other than startup in Table 2d to Subpart ZZZZ of Part 63 apply. [§63.6625(h)]

**Compliance Requirements:**

- 1) You must be in compliance with the emission limitations and operating limitations in Subpart ZZZZ of 40 CFR Part 63 that apply to you at all times. [§63.6605(a)]
- 2) You must demonstrate continuous compliance with each emission limitation and operating limitation in Tables 2b and 2d to Subpart ZZZZ of 40 CFR Part 63 that apply to you according to methods specified below (from Table 6 to Subpart ZZZZ of 40 CFR Part 63). [§63.6640(a)]

For Each...	Complying with the requirements to ...	You must demonstrate continuous compliance by ...
Existing stationary CI RICE not subject to any numerical emission limitations	Work or Management practices	<ol style="list-style-type: none"> <li>i Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or</li> <li>ii Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.</li> </ol>

**Recordkeeping:**

- 1) If you must comply with the emission and operating limitations, you must keep the records described in paragraphs (a)(1) through (a)(5), (b)(1) through (b)(3) and (c) of §63.6655. [§63.6655(a)]
  - a) A copy of each notification and report that you submitted to comply with Subpart ZZZZ of 40 CFR Part 63, including all documentation supporting any Initial Notification or Notification of Compliance Status that you submitted, according to the requirement in §63.10(b)(2)(xiv). [§63.6655(a)(1)]
  - b) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
  - c) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b). [§63.6655(a)(5)]
- 2) You must keep the records required in Table 6 of Subpart ZZZZ of 40 CFR Part 63 to show continuous compliance with each emission or operating limitation that applies to you. [§63.6655(d)]
- 3) Your records must be in a form suitable and readily available for expeditious review according to §63.10(b)(1). [§63.6660(a)]
- 4) As specified in §63.10(b)(1), you must keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.6660(b)]
- 5) You must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660(c)]

**Reporting:**

- 1) You must report each instance in which you did not meet each emission limitation or operating limitation in Table 2d to Subpart ZZZZ of 40 CFR Part 63 that apply to you. These instances are

deviations from the emission and operating limitations in Subpart ZZZZ of 40 CFR Part 63. These deviations must be reported according to the requirements in §63.6650. [§63.6640(b)]

- 2) You must also report each instance in which you did not meet the requirements in Table 8 to Subpart ZZZZ of 40 CFR Part 63 — Applicability of General Provisions to Subpart ZZZZ that apply to you. [§63.6640(e)]
- 3) *Reporting requirements* [§63.6650]
  - a) You must submit each report in Table 7 of Subpart ZZZZ of 40 CFR Part 63 that applies to you. [§63.6650(a)]
  - b) Unless the Administrator has approved a different schedule for submission of reports under §63.10(a), you must submit each report by the date in Table 7 of Subpart ZZZZ of 40 CFR Part 63 and according to the requirements in paragraphs (b)(1) through (b)(9) of §63.6650. [§63.6650(b)]
    - i) For semi-annual Compliance Reports, the first Compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.6595 and ending on June 30 or December 31, whichever date is the first date following the end of the first calendar half after the compliance date that is specified for your source in §63.6595. [§63.6650(b)(1)]
    - ii) For semi-annual Compliance Reports, the first Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date follows the end of the first calendar half after the compliance date that is specified for your affected source in §63.6595. [§63.6650(b)(2)]
    - iii) For semi-annual Compliance Reports, each subsequent Compliance report must cover the semi-annual reporting period from January 1 through June 30 or the semi-annual reporting period from July 1 through December 31. [§63.6650(b)(3)]
    - iv) For semi-annual Compliance Reports, each subsequent Compliance report must be postmarked or delivered no later than July 31 or January 31, whichever date is the first date following the end of the semi-annual reporting period. [§63.6650(b)(4)]
    - v) For each stationary RICE that is subject to permitting regulations pursuant to 40 CFR Part 70 or 71, and if the permitting authority has established dates for submitting semi-annual reports pursuant to 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6 (a)(3)(iii)(A), you may submit the first and subsequent Compliance Reports according to the dates the permitting authority has established instead of according to the dates in paragraphs (b)(1) through (b)(4) of §63.6650. [§63.6650(b)(5)]
    - vi) For annual Compliance Reports, the first Compliance report must cover the period beginning on the compliance date that is specified for your affected source in §63.6595 and ending on December 31. [§63.6650(b)(6)]
    - vii) For annual Compliance Reports, the first Compliance report must be postmarked or delivered no later than January 31 following the end of the first calendar year after the compliance date that is specified for your affected source in §63.6595. [§63.6650(b)(7)]
    - viii) For annual Compliance Reports, each subsequent Compliance report must cover the annual reporting period from January 1 through December 31. [§63.6650(b)(8)]
    - ix) For annual Compliance Reports, each subsequent Compliance report must be postmarked or delivered no later than January 31. [§63.6650(b)(9)]
  - c) The Compliance report must contain the information in paragraphs (c)(1) through (6) of §63.6650. [§63.6650(c)]
    - i) Company name and address. [§63.6650(c)(1)]

- ii) Statement by a responsible official, with that official's name, title, and signature, certifying the accuracy of the content of the report. [§63.6650(c)2]
  - iii) Date of report and beginning and ending dates of the reporting period. [§63.6650(c)3]
  - iv) If you had a malfunction during the reporting period, the compliance report must include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.6605(b), including actions taken to correct a malfunction. [§63.6650(c)4]
  - v) If there are no deviations from any emission or operating limitations that apply to you, a statement that there were no deviations from the emission or operating limitations during the reporting period. [§63.6650(c)5]
- d) For each deviation from an emission or operating limitation that occurs for a stationary RICE where you are not using a CMS to comply with the emission or operating limitations in Subpart ZZZZ of 40 CFR Part 63, the Compliance report must contain the information in paragraphs (c)(1) through (4) of §63.6650 and the information in paragraphs (d)(1) and (2) of §63.6650. [§63.6650(d)]
- i) The total operating time of the stationary RICE at which the deviation occurred during the reporting period. [§63.6650(d)1]
  - ii) Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken. [§63.6650(c)2]
- e) Each affected source that has obtained a title V operating permit pursuant to 40 CFR Part 70 or 71 must report all deviations as defined in Subpart ZZZZ of 40 CFR Part 63 in the semi-annual monitoring report required by 40 CFR 70.6 (a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a Compliance report pursuant to Table 7 of Subpart ZZZZ of 40 CFR Part 63 along with, or as part of, the semi-annual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the Compliance report includes all required information concerning deviations from any emission or operating limitation in Subpart ZZZZ of 40 CFR Part 63, submission of the Compliance report shall be deemed to satisfy any obligation to report the same deviations in the semi-annual monitoring report. However, submission of a Compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permit authority. [§63.6650(f)]

## IV. Core Permit Requirements

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

### 10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
  - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
    - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
    - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
    - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
    - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;
  - b) Yard waste, with the following exceptions:
    - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
    - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
    - iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
      - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
      - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
      - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
      - (4) In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the Department Director; and



- iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 4) Kingsford Manufacturing Company may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Kingsford Manufacturing Company fails to comply with the provisions or any condition of the open burning permit.
- a) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

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

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

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

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

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

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

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

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

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

- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) in accordance with the requirements outlined in this rule.
- 2) The permittee may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the Director.
- 6) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by June 1 after the end of each reporting period.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

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

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

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

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

#### **10 CSR 10-6.170**

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

###### **Emission Limitation:**

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the Director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.

- 3) Should it be determined that noncompliance has occurred, the Director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
  - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
  - b) Paving or frequent cleaning of roads, driveways and parking lots;
  - c) Application of dust-free surfaces;
  - d) Application of water; and
  - e) Planting and maintenance of vegetative ground cover.

**Monitoring:**

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

The permittee shall maintain the following monitoring schedule:

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

**Recordkeeping:**

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

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

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

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

### **10 CSR 10-3.090 Restriction of Emission of Odors**

#### **This requirement is not federally enforceable.**

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

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

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

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

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).

- e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
- f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

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

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

## V. General Permit Requirements

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

### 10 CSR 10-6.065(6)(C)1.B Permit Duration

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

### 10 CSR 10-6.065(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) October 1st for monitoring which covers the January through June time period, and
    - ii) April 1st for monitoring which covers the July through December time period.
    - iii) Exception. Monitoring requirements which require reporting more frequently than semi-annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit, this includes deviations or Part 64 exceedances.
  - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in paragraph (6)(C)7.A of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

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

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

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

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

#### **10 CSR 10-6.065(6)(C)1.F Severability Clause**

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

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

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



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

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

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

### **10 CSR 10-6.065(6)(C)1.I Reasonably Anticipated Operating Scenarios**

None.

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

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, as well as the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;

- c) Whether compliance was continuous or intermittent;
- d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
- e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

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

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

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

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

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable

under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

- 1) Section 502(b)(10) changes. Changes that, under section 502(b)(10) of the Act, contravene an express permit term may be made without a permit revision, except for changes that would violate applicable requirements of the Act or contravene federally enforceable monitoring (including test methods), record keeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, The permittee shall provide advance written notice to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, describing the changes to be made, the date on which the change will occur, and any changes in emission and any permit terms and conditions that are affected. The permittee shall maintain a copy of the notice with the permit, and the Air Pollution Control Program shall place a copy with the permit in the public file. Written notice shall be provided to the EPA and the Air Pollution Control Program as above at least seven days before the change is to be made. If less than seven days notice is provided because of a need to respond more quickly to these unanticipated conditions, the permittee shall provide notice to the EPA and the Air Pollution Control Program as soon as possible after learning of the need to make the change.
  - b) The permit shield shall not apply to these changes.

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

- 1) Except as noted below, the permittee may make any change in its permitted operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Insignificant activities listed in the application, but not otherwise addressed in or prohibited by this permit, shall not be considered to be constrained by this permit for purposes of the off-permit provisions of this section. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is subject to any requirements under Title IV of the Act or is a Title I modification;
  - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This notice shall not be required for changes that are insignificant activities under 10 CSR 10-6.065(6)(B)3. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and

- d) The permit shield shall not apply to these changes.

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

The application utilized in the preparation of this permit was signed by Steve Miller, Plant Manager. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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

This permit may be reopened for cause if:

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

#### **10 CSR 10-6.065(6)(E)1.C Statement of Basis**

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

## **VI. Attachments**

Attachments follow.





**Attachment C**  
**CAM Monitoring Approach for ACC**

<b>Kingsford Manufacturing Company - Belle, Missouri (KMC)            CAM Monitoring Approach for an After Combustion Chamber (ACC)            Controlling Particulate Matter (PM), Particulate Matter with an aerodynamic diameter less than 10 microns (PM10),            and Volatile Organic Compounds (VOC) Emissions            from Emission Units EU0010 and EU0160</b>	
Indicator	ACC temperature
Measurement Approach	ACC temperature shall be measured with a Type K thermocouple labeled TE-00701-01.
Indicator Range	The indicator range is defined as a temperature equal to or greater than 1,700 degrees Fahrenheit (°F) based on a three-hour rolling average. An excursion is defined as a temperature less than 1,700 degrees Fahrenheit (°F) based on a three-hour rolling average, excluding PRD events. KMC shall conduct performance testing no later than June 30, 2011 that ultimately establishes the ongoing three-hour rolling average temperature indicator range/excursion level. The indicator range/excursion level shall then become that three-hour rolling average temperature that is successfully demonstrated to achieve compliance with the applicable PM, PM <sub>10</sub> , and VOC emission limits by KMC during the above-referenced performance testing.
QIP Threshold	The QIP threshold for the ACC is a number of excursions that corresponds to 5% of the total operating time or greater in a 6-month reporting period. If the ACC reaches the QIP threshold, Kingsford Manufacturing Company shall submit a QIP for this air pollution control device and its associated emission units along with the Semi-annual Monitoring Report and/or Annual Compliance Certification for that particular reporting period.
<b>Performance Criteria</b>	
Data Representativeness	ACC temperature is that which is monitored by Type K thermocouple TE-00701-01.
Verification of Operational Status	NA
QA/QC Practices and Criteria	The accuracy of the thermocouple shall be verified by a second thermocouple in the ACC stack. The acceptance criterion shall be +/- 30 °F.
Monitoring Frequency	ACC temperature is measured once every second and is displayed continuously on one of the control room monitors. Three-hour rolling average ACC temperature measurements shall be recorded continuously.
Data Collection Procedure	
Averaging Period	The data acquisition system is to reduce the 1-second data points to 15-second data points and 3-hour rolling averages of the 15-second data points.
Reporting	Summary information on the number, duration, and cause for any excursions and temperature monitor downtime shall be reported on a semi-annual basis in the Semi--Annual Monitoring Report and/or the Annual Compliance Certification.

**Attachment D**  
 CAM Monitoring Approach for Baghouses

<b>Kingsford Manufacturing Company - Belle, Missouri (KMC)            CAM Monitoring Approach for Baghouses controlling Particulate Matter (PM) Emissions            From Emission Units EU0020, EU0140, and EU0170</b>		
	Indicator #1	Indicator #2
Indicator	Visible Emissions	Pressure Drop
Measurement Approach	EPA Reference Method 22-like Procedures	Differential Pressure Gauge
Indicator Range	The indicator range is defined as no visible emissions. An excursion is defined as the presence of visible emissions.	The indicator range is defined as a pressure drop between 2.0 inches of water column (in H <sub>2</sub> O) and 8.0 in H <sub>2</sub> O. An excursion is defined as a pressure drop less than 2.0 in H <sub>2</sub> O or a pressure drop greater than 8.0 in H <sub>2</sub> O.
	An excursion of either indicator constitutes an excursion. If visible emissions are present when the pressure drop is within its specified indicator range and no baghouse problems are identified as the cause, the pressure drop indicator range shall be re-evaluated by KMC. Excursions trigger an inspection, corrective action, and a reporting requirement. If an excursion results in excess emissions exceeding one hour, Kingsford Manufacturing Company may elect to file a startup, shutdown, and malfunction assertion under 10 CSR 10-6.050 if appropriate to the situation. Corrective action to eliminate the visible emissions shall be initiated upon detection in accordance with KMC's attached procedures entitled "Baghouse Excursion Corrective Action Procedure for EU0020, EU0140, & EU0170"	
QIP Threshold	The QIP threshold for any individual emission unit is 9 excursions in a 6-month reporting period. If any emission unit reaches the QIP threshold, Kingsford Manufacturing Company shall submit a QIP for that emission unit along with the Semi-annual Monitoring Report and/or Annual Compliance Certification for that particular reporting period.	
Performance Criteria		
Data Representativeness	Measurements are made at the baghouse stack exhausts.	Pressure drop taps are located at the inlet and outlet of each baghouse. The gauge has a minimum accuracy of 0.25 in H <sub>2</sub> O.
Verification of Operational Status	NA	NA
QA/QC Practices and Criteria	The visible emission observer will be familiar with Method 22 and follow Method 22-like procedures.	The differential pressure gauge shall be calibrated annually. Pressure drop taps shall be checked for plugging daily.
Monitoring Frequency	Daily.	Daily.
Data Collection Procedure	Manually recorded.	Manually recorded.
Averaging Period	NA	None.
Reporting	Summary information on the number, duration, and cause for any excursions shall be reported on a semi-annual basis in the Semi-Annual Monitoring Report and/or the Annual Compliance Certification.	



### **Attachment E**

#### Baghouse Excursion Corrective Action Procedure

#### **Kingsford Manufacturing Company – Belle, Missouri Baghouse Excursion Corrective Action Procedure for EU0020, EU0140, & EU0170.**

1. Perform daily Method 22 visual inspection of the dust collector.
2. If visual emissions are seen, immediately contact a Method 9 certified individual to perform a Method 9 test.
3. If the Method 9 inspection exceeds the opacity limit of 20%, then the dust collector shall be shut down immediately and not be put back into service until corrections are made. Note that this may require portions of the operation be shut down
4. If the Method 9 inspection does not exceed the opacity limit, then the following typical procedure shall be followed.
  - Notify and schedule maintenance personnel, confined space entrants, confined space attendants, and a confined space supervisor for inspection and repair of the unit.
  - Prepare and review a safety risk prediction before beginning work.
  - Begin the inspection process which typically is done with the aid of a Visolite test. To replace trying to find leaks with the naked eye alone, Visolite, a lightweight fluorescent powder, is injected into the baghouse. The powder follows the path of least resistance, accumulating around the source of leakage. A monochromatic light is then used to pinpoint the exact location of air leakage and indicate its severity.
  - Follow the confined space procedures for entering the dust collector. A typical list of activities includes providing trained and qualified confined space attendants and entrants, full lockout of the system including installation of the ductwork bladders to blank off the system, provide adequate ventilation within the unit, test the confined space for acceptable oxygen levels and temperature levels, wear proper PPE, and obtain authorization before entering the space.
  - Trained and qualified confined space entrants conduct an investigation of the dust collector to determine which areas and/or bags require corrective action.
  - The necessary parts are obtained from an off site warehouse.
  - If any cutting, grinding, or welding is required in the dust collector then obtain a hot work permit.
  - The necessary repairs are completed and the unit is placed back into service.

Normally, the procedure above can be completed within 24 hours. However, the time may be extended on weekends or holidays due to the availability of qualified confined space entrants, confined space attendants, and a confined space supervisor.





**Attachment H**  
**10 CSR 10-6.220 Compliance Demonstration**

Method 9 Opacity Emissions Observations

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

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

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

**Attachment I**  
**VOC Compliance Worksheet**

This sheet covers the period from \_\_\_\_\_ to \_\_\_\_\_.  
 (month, year) (month, year)

Copy this sheet as needed.

Column A	Column B	Column C	Column D
Process Description	Amount of STB Produced (Tons) (Note 1)	VOC Emission Factor (lb VOC/Ton STB Produced) (Note 2)	Process VOC Emissions (Tons) (Note 3)
Fugitive STB Emissions (EU0010) (EP-4)			
Matchlight™ Routed to ACC (EU0010) (EP-4)			
Matchlight™ Routed to Air (EU0160) (EP-26)			
BBQ Bag™ Routed to ACC (EU0010) (EP-4)			
BBQ Bag™ Routed to Air (EU0160) (EP-26)			
Total VOC Emissions Calculated for this Month (Tons)		(Note 4)	
12-Month VOC Emissions Total From Previous Month's Worksheet (Tons)		(Note 5)	
Monthly VOC Emissions Total From Previous Year's Worksheet (Tons)		(Note 6)	
Current 12-Month Total VOC Emissions (Tons)		(Note 7)	

Note 1: Total amount of STB produced during this month for each scenario.

Note 2: Emission factors calculated based on information submitted by Kingsford in the construction permit review and assuming a 95% efficiency for the ACC.

- Fugitive STB emissions – 2.02 lb VOC/Ton STB Produced
- Matchlight™ Routed to ACC – 0.2429 lb/VOC/Ton STB Produced
- Matchlight™ Routed to Air – 4.858 lb VOC/Ton STB Produced
- BBQ Bag™ Routed to ACC – 0.0405 lb VOC/Ton STB Produced
- BBQ Bag™ Routed to Air – 0.81 lb VOC/Ton STB Produced

Note 3: Column D = (Column B)\*(Column C)/(2000lb/ton)

Note 4: Sum of Monthly emissions reported in Column D.

Note 5: Running 12-month total of VOC emissions.

Note 6: VOC emissions reported for this month in the last calendar year.

Note 7: Amount reported in Note 4 plus amount reported in Note 5 minus amount reported in Note 6. Less than 85 tons indicates compliance.





## STATEMENT OF BASIS

### Permit Reference Documents

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

- 1) Part 70 Operating Permit Application, Received July 17, 2006;
- 2) Initial Part 70 Operating Permit, OP2002-003, Issued January 14, 2002;
- 3) 2009 Emissions Inventory Questionnaire;
- 4) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 5) U.S. EPA, Factor Information Retrieval System (FIRE), Version 6.25;
- 6) Construction Permit Number 062007-012;
- 7) Construction Permit Number 102003-014;
- 8) Construction Permit Number 092000-001;
- 9) Temporary Installation Permit Number: 0898-004;
- 10) Prevention of Significant Deterioration (PSD) Construction Permit Number: 1093-019;
- 11) Construction Permit Number: 0793-017;
- 12) Construction Permit Number: 1180-002;
- 13) Construction Permit Number: 0780-001;
- 14) Construction Permit Number: 0979-036; and
- 15) Construction Permit Number: 0979-034;

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

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

None

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

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

#### 10 CSR 10-6.330, *Restriction of Emissions from Batch Type Charcoal Kilns*

This regulation applies to all batch-type charcoal kilns that manufacture charcoal with a batch process rather than a continuous process. Kingsford Manufacturing Company does not own or operate any batch-type charcoal kilns.

### Construction Permit Revisions

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

- 1) Prevention of Significant Deterioration (PSD) Construction Permit Number 1093-019;  
Analysis of the initial stack test results from Construction Permit Number 1093-019 by Kingsford



Manufacturing Company and the Air Pollution Control Program lead to an agreement to make changes to some of the special conditions from Construction Permit Number 1093-019, in Construction Permit Number 0697-010A.

- a) The NO<sub>x</sub> and CO concentration correction to 12% CO<sub>2</sub> for the dryer exhaust will be eliminated as the dilution air added to the hot retort ACC gases is necessary if the ACC exhaust gas is to be used in the briquet drying system.
- b) TOC levels measured by Method 25A in both the ACC and the briquet dryer exhausts were found to be close to the ambient conditions, but still exceeded the permit limit when calculated to lb/hr and lb/ton. A revised limit of 15 ppm, will be applied to both the ACC and the dryer exhaust stacks. The ACC concentration will be corrected to 12% CO<sub>2</sub>.
- c) Particulate emission limits from the ACC and briquet dryer stacks will be combined into one umbrella PM<sub>10</sub> limit. The ACC exhaust is vented to the atmosphere and is used to dry briquets where it exits as dryer exhaust. As the drying demand increases an increased portion of ACC exhaust exits the dryer stack and the reverse occurs as drying demand is decreased. It is appropriate then to utilize a combined limit.

2) Construction Permit Number 062007-012:

Kingsford Manufacturing Company operates a multi-hearth charcoal retort furnace that produces char from dry wood. The furnace is part of the “wood drying and charring” emissions unit that includes a rotary wood dryer, the furnace, and associated material handling, product recovery, and air pollution control systems. The emissions unit is exhausted through the After Combustion Chamber (ACC). The furnace consists of five (5) hearths, and transfers dry, sized wood from hearth to hearth through drop-out holes via rotating rabble arms attached to a central shaft. The wood is pyrolyzed as it passes through the furnace into a high-carbon char material. In this project, Kingsford Manufacturing Company replaced two of the furnace hearths and enlarged the drop-out holes in these hearths. The enlarged drop-out holes should improve the furnace temperature profile, improve quality consistency, and reduced process upsets. The enlarged holes should also reduce plugging and should allow increased operating hours between scheduled maintenance downtime. The furnace downtime may decrease from once every three weeks to once every four weeks as a result of the furnace modifications.

Kingsford conducted stack testing in accordance with its PSD permit and Construction Permit 0697-010A on November 27-29, 2007. Under the five (5) year permit testing frequency requirement, this would have Kingsford conducting another stack test by at least around November 27, 2012.

However, Kingsford Manufacturing Company will conduct performance testing according to the CAM plan no later than June 30, 2011, that ultimately establishes the ongoing three-hour rolling average temperature indicator range/excursion level. The indicator range/excursion level shall then become that three-hour rolling average temperature that is successfully demonstrated to achieve compliance with the applicable PM, PM<sub>10</sub>, and VOC emission limits by Kingsford Manufacturing Company during the above-referenced performance test. The testing requirement of Construction Permit 062007-012 will be fully satisfied by the CAM testing requirement.

- 3) Temporary Installation Permit Number 0898-004;  
The installation obtained a temporary installation permit to install and operate equipment to evaluate the feasibility of replacing anthracite coal with metallurgical coke. The feasibility study was expected to last six months. The temporary permit expired on January 28, 1998. Therefore, this permit was not included in the operating permit.
- 4) Construction Permit Number 1189-010;  
Special Conditions 3 and 4 – These special conditions are applicable to a 4.2 MMBTU Boiler that uses No. 2 Fuel Oil. Kingsford Manufacturing Company removed the 4.2 MMBTU Boiler in 1992. Therefore, Special Conditions 3 and 4 are no longer applicable to the installation.
- 5) Construction Permit Number 1180-002;  
This construction permit was issued for a pyrolysis plant for the production of charcoal. The permit was issued for a fluidized bed combustion device that would produce charcoal from wood wastes. This process was removed and dismantled. Therefore, this construction permit was not included in the operating permit.
- 6) Construction Permit Number 0780-001;  
This construction permit is for the Solvent Treated Briquet System. The Solvent Treated Briquet System was reconfigured in 1999, to route the volatile organic compound fumes from the solvent treated briquet system into the retort after combustion chamber for incineration, this was covered under Construction Permit Number 0699-003. Construction Permit Number 0699-003 supercedes Construction Permit Number 0780-001. Therefore, the Construction Permit Number 0780-001 is no longer applicable to the installation.
- 7) Construction Permit Number: 0979-036;  
This construction permit is applicable to a six (6) ton per hour #3 briquet dryer that is fired by No. 2 Fuel Oil. Kingsford Manufacturing Company replaced the six (6) ton per hour #3 briquet dryer with a twelve (12) ton per hour briquet dryer and integral cooler in 1997. Therefore, construction permit number 0979-036 is no longer applicable to the installation.
- 8) Construction Permit Number 0979-034;  
This construction permit is applicable to a Rail Car Lignite Unloading and Storage Facility. According to Frank Kukla of Clorox Company, no rail system was ever built for the unloading and storage of lignite at the Kingsford Manufacturing Company. Therefore, Construction Permit Number 0979-034 is no longer applicable to the installation.
- 9) Construction Permit Number 102003-014;  
This construction permit was issued to modify the retort wood drying process by increasing the cyclone discharge opening by replacing two 16-inch diameter screw conveyors that discharge sawdust fines from the wood dryer cyclones with 20-inch screw conveyors. There were no special conditions associated with Air Pollution Control Program Construction Permit Number 102003-014.
- 10) Construction Permit Number 092000-001;  
This construction permit was issued to modify the Retort ACC Burners. There were no special conditions associated with Air Pollution Control Program Construction Permit Number 092000-001.

11) Construction Permit Number 0793-017;

There were no special conditions associated with Air Pollution Control Program Construction Permit Number 0793-017.

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

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

1) 40 CFR Part 60, Subpart Y – *Standards of Performance for Coal Preparation Plants*

This standard is applicable to any of the following affected facilities in coal preparation plants which process more than 200 tons per day and commenced construction or modification after October 24, 1974:

- Thermal dryers, pneumatic coal-cleaning equipment (air tables), coal processing and conveying equipment (including breakers and crushers), coal storage systems and coal transfer and loading systems.

The coal processing and conveying equipment are subject to the requirements of this standard.

2) 40 CFR Part 60, Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units.*

This subpart applies to each steam generating unit for which construction, modification, or reconstruction is commenced after June 9, 1989, and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million Btu/hr) or less, but greater than or equal to 2.9 MW (10 million Btu/hr).

EU0120 – Boiler rated at 16.8 MMBtu/hr was constructed in 1993, after the applicability date of this subpart, therefore is subject to this subpart.

3) 40 CFR Part 60, Subpart K – *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification commenced After June 11, 1973*

40 CFR Part 60, Subpart Ka, *Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification commenced After May 18, 1978, and Prior to July 23, 1984*

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.*

The following storage tanks are below the level of reporting significance (Subpart K & Ka – 40,000 gallons and Subpart Kb – 19,812.9 gallons or the material being stored (No. 2 Fuel Oil) does not meet the definition of petroleum liquids according to 40 CFR Part 60, Subpart Ka and therefore are not subject to 40 CFR Part 60 Subpart Ka or Kb):

Description	Capacity
Diesel Tank – Dozer Fuel	500 Gallons
Diesel Tank – Fire Pump No. 1	250 Gallons
Diesel Tank – Fire Pump No. 2	250 Gallons
Gasoline Tank – Vehicles	300 Gallons
Gasoline Tank – Equipment	500 Gallons
Diesel Tank – Equipment	2000 Gallons
Propane Tank	850 gallons

Description	Capacity
Propane Tank	1000 gallons

The following storage tanks are not subject to the requirements of Subpart Kb. This subpart does not apply to storage vessels with a capacity greater than or equal to 151 m<sup>3</sup> (39,890 gallons) storing a liquid with a maximum true vapor pressure less than 3.5 kilopascals (kPa) (0.5 psia) or with a capacity greater than or equal to 75 m<sup>3</sup> (19,812.9 gallons) but less than 151 m<sup>3</sup> storing a liquid with a maximum true vapor pressure less than 15.0 kPa (2.18 psia). The true vapor pressure of the materials being stored are less than 15.0 kPa. [§60.110b(b)]

Description	Capacity (m <sup>3</sup> )	Solvent Vapor Pressure (kPa)
Diesel Fuel Storage Tank	113.56	0.06
Three (3) Matchlight™ Pretreat (Briquet Solvent) Tank	113.56	0.40

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

40 CFR Part 63, Subpart ZZZZ, *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines*

The installation operates emergency diesel generator whose operations are limited to emergency situations and two fire pump diesel engines with ratings less than 500 brake horsepower constructed/reconstructed before June 12, 2006 (existing). Since, Kingsford Manufacturing Company is an area source of hazardous air pollutants, the emergency generator and the diesel engines are subject to 40 CFR Part 63, Subpart ZZZZ.

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

10 CSR 10-6.080, *Emission Standards for Hazardous Air Pollutants*

40 CFR Part 61 Subpart M – *National Emission Standard for Asbestos*, §61.145(a), Standard for demolition and renovation, applies to the installation.

**Compliance Assurance Monitoring (CAM) Applicability**

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

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

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

Kingsford’s Belle facility has several emitting units with potential pre-control emissions in excess of major source thresholds that satisfy the CAM applicability criteria listed above. These emission units include:

Emission Unit	Emission Unit Description	Control Device	Pollutant
EU0010	After Combustion Chamber	ACC	PM/PM <sub>10</sub> /VOC
EU0020	Raw Material Infeed	Raw Material Infeed Dust Collector	PM/PM <sub>10</sub>
EU0140	Briquet Transfer	Briquet Transfer Dust Collector	PM/PM <sub>10</sub>
EU0160	Solvent Treated Briquet System	ACC	VOC

Emission Unit	Emission Unit Description	Control Device	Pollutant
EU0170	Briquet Packaging	Briquet Packaging Dust Collector	PM/PM <sub>10</sub>

CAM plans for the above listed sources are incorporated in the operating permit (See Attachments C, D and E)

**Other Regulatory Determinations**

1) 10 CSR 10-6.065, Operating Permits, Voluntary Condition:

The Belle facility is a minor source of hazardous air pollutants (HAPs). Potential emissions are estimated to be less than 10 tons per year (tpy) for methanol, the single largest HAP pollutant from charcoal manufacturing. Small quantities of lead emissions are also emitted from the manufacturing operations. Potential emissions of all HAPs combined are estimated to also be less than 10 tpy based on Kingsford Manufacturing Company review of industry and EPA emission data and engineering judgment. Methanol emissions have been estimated based on EPA AP-42 factors for uncontrolled charcoal kiln operations. The AP-42 Section 10.7 methanol emission factor for uncontrolled batch charcoal kilns is 150 lb/ton of charcoal produced. Methanol is easily oxidized at the high temperatures present in the ACC afterburner which Kingsford Manufacturing Company employs to control emissions from the Belle continuous charcoal furnace system. Kingsford Manufacturing Company estimates that the ACC methanol destruction efficiency exceeds 99.99% based on the minimum ACC temperature of 1,600°F and the ACC residence time of more than 2.0 seconds. For annual Form R toxic release reporting, Kingsford Manufacturing Company assumes a methanol destruction efficiency of 99.99%. To conservatively estimate potential methanol air emissions, an ACC destruction efficiency of 99.9% will be used in conjunction with the estimated maximum annual char production rate of 61,320 tpy (7 tons per hour, 8,760 hrs/yr).

Potential methanol emissions are calculated as follows:

$$(61,320 \text{ tpy char}) \times (150 \text{ lb methanol/ton char}) \times (100 - 99.9)/100 = 9,198 \text{ lb/yr methanol}$$

$$\text{Potential Emissions} = 4.6 \text{ tpy methanol}$$

This demonstrates that potential emissions of methanol, which is classified as a HAP, are significantly less than the major source threshold of 10 tpy. The EPA AP-42 section for charcoal manufacturing does not identify any emission factors for other organic HAPs. Based on the relatively large fraction of methanol compared to VOC in the charcoal AP-42 factors (more than 50% is methanol), Kingsford Manufacturing Company believes that any other organic HAP emissions would be less than the methanol emission estimate provided here. Consequently, potential HAP emissions from the charring operation (EU0030) are believed to be significantly less than 10 tpy in total.

The solvents used to produce Solvent Treated Briquet System (STB) products do not contain HAP compounds. Small quantities of solvents classified as HAPs are used by insignificant activities such as inks in packaging and degreasers in maintenance operations. MSDS information for the raw

materials used by Kingsford Manufacturing Company at Belle do not identify any HAP compounds. Kingsford Manufacturing Company does estimate small quantities of lead emissions in Form R reports based on EPA guidance that trace quantities of lead are present in wood.

Based on this review of potential HAP emissions from the Belle plant operations, the Belle plant is a minor source of HAP emissions. The air construction permit requirement to maintain a minimum ACC temperature of 1,600°F ensures that potential methanol emissions are minor. .

Kingsford Manufacturing Company requested that the Missouri Department of Natural Resources include a federally enforceable HAP emissions cap when the Title V permit is renewed. Kingsford Manufacturing Company requested a facility-wide emissions cap of 10 tons per year for any single HAP and 25 tons per year for any combination of HAPs. These limitations will become federally enforceable operating conditions after the issuance of this permit.

2) 10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*  
EU0120 – Boiler

It was stated in the Initial Operating Permit that the boiler is subject to 10 CSR10-3.060 with an emission limit of 0.5 lb/MMBTU heat input. The boiler was installed in 1993 and is subject to 10 CSR 10-6.070, NSPS (40 CFR Part 60, Subpart Dc). According to 10 CSR 10-3.060(3)(E), this rule shall not apply to units subject to the provisions of 10 CSR 10-6.070. Therefore, the requirements of 10 CSR 10-3.060 are not included in this operating permit.

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

10 CSR 10-6.400 limits the amount of particulate matter that is allowed from an emission unit, and is dependent on the process weight rate material processed. The emission units to which this rule applies are listed below. The following calculations provide the allowable particulate emission rate based on 10 CSR 10-6.400 and the potential (maximum) emission rate including particulate emission control equipment. Potentials to emit presented below were calculated based on sources Maximum Design Rate (MDR). If the emissions from these emission units can not violate the limits of this rule then evidence of this is demonstrated in the following calculations.

One of the following equations from 10 CSR 10-6.400 is used to calculate the PM allowable limit:

$E = 4.10P^{0.67}$  for process weight rates up to 30 tons (60,000 lbs) per hour, and

$E = 55.0P^{0.11} - 40$  for process weight rates greater than 30 tons (60,000 lbs) per hour

Where: E = rate of emission in lb/hr; and

P = process weight rate in tons/hr (maximum hourly design rate)

- a) At maximum design rates, the uncontrolled potential PM emission rates for the units listed in the table below based on FIRE factors are less than the allowed exemption level of 10 CSR 10-6.400(1)(B)11. (i.e., 0.5 lbs/hr), therefore these units are not subject to the provisions of this rule. Emission factors used are from FIRE [SCC: 3-05-011-09].

Potential PM Emission Rate = MHDR(tons/hr) \* Emission Factor(lb/ton)

Emission Unit #	Maximum Hourly Design Rate (tons/hr)	PM Emission Factor (lb/ton)	Emission Factor Reference	Potential Uncontrolled PM Emission Rate (lb/hr)	PM Emission Limit (lb/hr)
EU0050	1.50	0.24	Fire SCC: 3-05-011-07	0.36	17.51
EU0051	1.50	0.20	Fire SCC: 3-05-011-01	0.30	17.51
EU0080	3.00	0.04	Fire SCC: 3-05-011-09	0.12	8.56
EU0230	5.00	0.04	Fire SCC: 3-05-011-09	0.20	12.05

- b) At maximum design rates, the uncontrolled potential PM emission rates for the units listed in the table below based on FIRE factors are less than their corresponding allowable PM emission limits. No monitoring, record keeping or reporting is required.

$$\text{Potential PM Emission Rate} = \text{MHDR(tons/hr)} * \text{Emission Factor(lb/ton)}$$

Emission Unit #	Maximum Hourly Design Rate (tons/hr)	PM Emission Factor (lb/ton)	Emission Factor Reference	Potential Uncontrolled PM Emission Rate (lb/hr)	PM Emission Limit (lb/hr)
EU0030	33.30	0.04	Fire SCC: 3-05-011-09	1.33	40.88
EU0040	33.30	0.04	Fire SCC: 3-05-011-09	1.33	40.88
EU0070	32.00	0.04	Fire SCC: 3-05-011-09	1.28	40.52
EU0180	32.00	0.04	Test (95% controlled factor)	26.20	40.52
EU0200	3.00	0.24	Fire SCC: 3-05-011-07	0.72	8.56
EU0210	3.00	0.24	Fire SCC: 3-05-011-07	0.72	8.56
EU0240	33.30	0.04	Fire SCC: 3-05-011-09	1.33	40.88
EU0250	33.30	0.04	Fire SCC: 3-05-011-09	1.33	40.88
EU0260	33.30	0.04	Fire SCC: 3-05-011-09	1.33	40.88

- c) At maximum design rates, the uncontrolled potential PM emission rates in lbs/hr for emission units EU0020, EU0140 and EU0170 listed in the table below exceed the 10 CSR 10-6.400 limit. However, the hourly controlled emissions are far below the regulatory limit. Since the pre-control PM emissions in tons per year are above the major source threshold of 100 tons per year and the baghouses are required to comply with the 10 CSR 10-6.400 limit, these units are subject to CAM. CAM plans for these units are incorporated in the operating permit.

Emission Unit #	Maximum Hourly Design Rate (tons/hr)	Pre-Control PM Emission Factor <sup>1</sup> (lb/ton)	Pre-Control Potential PM Emission		Baghouse Exhaust Flowrate (scfm)	Baghouse Outlet PM Concentration <sup>4</sup> (gr/scf)	Baghouse PM Emission <sup>5</sup> (lb/hr)	PM Emission Limit <sup>6</sup> (lb/hr)
			(lb/hr) <sup>2</sup>	(ton/year) <sup>3</sup>				
EU0020	40.00	6.26	250.40	1,097	28,000	0.01	2.4	40.88
EU0140	40.00	1.72	68.80	301	60,000	0.01	5.1	40.88
EU0170	40.00	7.29	291.60	1,277	28,000	0.01	2.4	40.88

Notes:

1. Pre-control PM emission factors derived from baghouse inlet testing at KMC Parsons, WV plant.
2. Pre-control PM emissions calculated based on maximum hourly design rate and pre-control PM factors.
3. Pre-control PM emissions calculated based on maximum hourly design rate, 8,760 hr/year, and pre-control PM factors.
4. Baghouse filter outlet PM concentration.
5. Baghouse PM emissions estimated using exhaust flowrates and outlet PM concentrations.
6. Allowable PM emissions based on MDNR "process weight" rule at 10 CSR 10-6.400.

d) According to 10 CSR 10-6.400(1)(B)7., the following fugitive sources are not subject to this rule.

EQ Reference #	Description of Emission Unit
EP-1	Truck Traffic Fugitive Dust
EP-2	Hog Fuel Unloading (fugitive) – Sawdust Pile Handling
EP-3	Hog Fuel Unloading (fugitive) – Sawdust Pile Handling
EP-6	Charcoal Unloading, Storage and Handling (fugitive)
EP-11	Lime Unloading, Storage and Handling (fugitive)
EP-12	Sawdust Unloading, Storage and Handling (fugitive)
EP-13	Blend Hammer Mill
EP-16	Nitrate Bag Handling to Hopper (process enclosed – 4 sided building)
EP-17	Borax Bag Handling to Hopper (process enclosed – 4 sided building)
EP-20	Hog Fuel Mixing (fugitive – dust suppression by wetting agent)
EP-21	Convey to Briquet Roll Presses (process enclosed)
EP-22	Briquetting – Dual Briquet Roll Presses (fugitive)
EP-35	Mesquite Briquet Handling (fugitive)
	Portable Vacuum Dust Collectors
	Packaging Central Vacuum System
	Packaging Bag Top Catcher

- 4) The units listed in the “Emission Units Without Limitations” section in the front of this permit either have no applicable regulations associated with them or are considered insignificant activities.
- a) The sources in the table below listed as units without limitation are fugitive sources that do not emit regulated pollutants from a discrete stack or vent. These sources emit particulate matter



directly into the ambient air. These sources do not have any type of capture/control devices and are not covered or required to control their emissions based on any past or current regulations. These sources are not subject to any specific rule except the core permit requirement of 10 CSR 10-6.170 and must comply with this requirement.

EQ Reference #	Description of Emission Unit
EP-1	Truck Traffic Fugitive Dust
EP-2	Hog Fuel Unloading (fugitive) – Sawdust Pile Handling
EP-3	Hog Fuel Unloading (fugitive) – Sawdust Pile Handling
EP-6	Charcoal Unloading, Storage and Handling (fugitive)
EP-11	Lime Unloading, Storage and Handling (fugitive)
EP-12	Sawdust Unloading, Storage and Handling (fugitive)
EP-13	Blend Hammer Mill
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EP-35	Mesquite Briquet Handling (fugitive)
	Portable Vacuum Dust Collectors
	Packaging Central Vacuum System
	Packaging Bag Top Catcher

b) The following is the list of equipment not subject to an applicable requirement identified as insignificant activities at the time of permit issuance. However, the installation is not limited to those activities listed, below.

- (3) 30,000 Gallon Briquet Solvent Pretreat Storage Tanks
- 30,000 Gallon Diesel Fuel Storage Tank
- Ink for Packaging Bag Coders
- Parts Cleaning
- 11 Maintenance Heaters – Kerosene
- Diesel Tank – Dozer Fuel
- Diesel Tank – Fire Pump No. 1
- Diesel Tank – Fire Pump No. 2
- Gasoline Tank – Vehicles
- Gasoline Tank – Equipment
- Diesel Tank – Equipment
- Used Oil Tank
- Make-up Fluid for Packaging Bag Coders
- QC Burn Ovens (used to test the quality of the charcoal briquets)

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

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

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

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

Prepared by:

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