



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

**JUN 07 2019**

Ms. Lorie Souders  
Administrative Assistant  
Landmark Manufacturing Corporation  
Route 1, Box 223  
Gallatin, MO 63640

RE: New Source Review Permit Amendment - Permit Number: 0597-009A  
Project Number: 2019-02-034; Installation Number: 061-0010

Dear Ms. Souders:

On February 15, 2019, the Air Pollution Control Program received your letter requesting an amendment to Construction Permit 0597-009. The letter specifically calls for a request to amend Special Condition 1. which limited the amount of waste oil, in tons, that both the Trane boiler (EU-18), which was permitted for installment under Permit 0597-009, and an existing coal/oil fired boiler, which is no longer on site, were allowed to combust.

Special Condition 1. of the original permit was established based on the maximum amount of the limiting fuel oil type (i.e. Fuel Oil #5) that would result in a maximum of 20 tons per year of SO<sub>x</sub>. This limit was taken to avoid exceeding the operating permit major threshold of 100 tons per year of SO<sub>x</sub> because at the time of issuance of the original permit, the existing SO<sub>x</sub> potential emissions of the installation were 75 tons per year.

This amendment supersedes all special conditions in Construction Permit 0597-009 and establishes a new condition that limits the amount of fuel oil the Trane Boiler (EU-18) can combust to 254,777 gallons. This amount was established in Permit 0597-009 as a limit of 1,019.11 tons of fuel oil (Special Condition 1) which was also stated as 254,777 gallons in the permit's project description.

This amendment also establishes a new condition that limits the maximum sulfur content of all fuel oils (including used oil) that the installation burns to 1% by weight.



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Table 1: Potential to Emit (PTE), tons per year (tpy)

Pollutant	De Minimis Limit	PTE of the Trane Boiler (EU-18) <sup>1</sup>	Installation PTE
PM	25	1.29	8.01
PM <sub>10</sub>	15	1.29	8.01
PM <sub>2.5</sub>	10	0.90	6.02
SO <sub>x</sub>	40	20.00	20.21
NO <sub>x</sub>	40	8.73	16.24
CO	100	3.46	9.77
VOC	40	0.23	38.99
HAP	25 - Combined	0.078	13.32
HAP	10 - Individual	N/D	Largest: Xylenes - 7.49

On February 18, 2014, the Air Pollution Control Program received an Intermediate Operating Permit Renewal Application for Landmark Manufacturing Corporation (Project #2014-02-039). According to Missouri State Rule 10 CSR 10-6.065, *Operating Permits*, **no operating permit is required** from the Missouri Air Pollution Control Program. Based upon the updated potential to emit values for this project, the installation uncontrolled potential emissions, including fugitive sources, are less than the de minimis emissions levels (see Table 1 above).

The installation remains obligated to meet all applicable air pollution control rules, Department of Natural Resources' rules, and all other applicable federal, state, or local agency regulations. In particular, for the Trane Boiler (EU-18), the installation should comply with the following rules:

- 10 CSR 10-6.050, *Start-up, Shutdown, and Malfunction Conditions*
- 10 CSR 10-6.165, *Restriction of Emission of Odors*
- 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*
- 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds<sup>2</sup>*
- 10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions<sup>3</sup>*
- 10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used For Indirect Heating*
- 40 CFR Part 63, Subpart JJJJJ - *National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources*

<sup>1</sup> Values listed are worst-case between Natural Gas, Propane, Fuel Oil 1, Fuel Oil 2, Fuel Oil 4, and Fuel Oil 5.

<sup>2</sup> This regulation was rescinded from Missouri Code of State Regulations on November 30, 2015 but it remains in Missouri's SIP and thus still remains an applicable federal regulation. Upon adoption of 10 CSR 10-6.261 into Missouri's SIP, 10 CSR 10-6.260 will be removed from the SIP and thus this rule will no longer be applicable to the installation.

<sup>3</sup> Missouri's SIP has not adopted this regulation; therefore, this regulation is a state only requirement. Upon adoption into Missouri's SIP this regulation will be both a state and federal requirement. No action is required on the part of the permittee upon the adoption of 10 CSR 10-6.261 into the Missouri SIP.

Ms. Lori Souders  
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If you are adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: [www.ao.mo.gov/ahc](http://www.ao.mo.gov/ahc).

If you have any questions regarding this amendment, please do not hesitate to contact Susan Heckenkamp at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kendall B. Hale  
Permits Section Chief

KBH:abk

Enclosures

c: Kansas City Regional Office  
PAMS File: 2019-02-034  
PAMS File: 2014-02-039

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Permit No.	0597-009A
Project No.	2019-02-034

### SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

*The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (3)(E). "Conditions required by permitting authority."*

Landmark Manufacturing Corporation  
Daviness County, S30, T59N, R26

#### 1. Superseding Condition

The conditions of this permit supersede all special conditions found in the previously issued construction permit 0597-009 issued by the Air Pollution Control Program.

#### 2. Fuel Throughput Requirement

- A. Landmark Manufacturing Corporation shall not combust more than 254,777 gallons total of all fuel oil (including used oil) in any consecutive 12-month period in their Trane Boiler (EU-18).
- B. Landmark Manufacturing Corporation shall record the monthly and 12-month rolling total gallons of all fuel oil (including used oil) burned. Landmark Manufacturing Corporation shall use Attachment A or an equivalent form for this purpose.

#### 3. Sulfur Content Requirement

- A. Landmark Manufacturing Corporation shall exclusively combust low sulfur fuel oil in their Trane boiler (EU-18) with a sulfur content less than or equal to 1% by weight.
- B. Landmark Manufacturing Corporation shall demonstrate compliance with Special Condition 3.A by obtaining records of the fuel's sulfur content from the vendor for each shipment of fuel received or by testing each shipment of fuel for the sulfur content in accordance with the method described in 10 CSR 10-6.040 *Reference Methods*.
- C. Landmark Manufacturing Corporation shall keep the records required by Special Condition 3.B with the unit and make them available for Department of Natural Resources' employees upon request.

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**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

**4. Record Keeping Requirement**

Landmark Manufacturing Corporation shall maintain all records required by this permit for not less than five years and make them available to any Missouri Department of Natural Resources' personnel upon request.

**5. Reporting Requirement**

Landmark Manufacturing Corporation shall report to the Air Pollution Control Program, Compliance/Enforcement Section at P.O. Box 176, Jefferson City, MO 65102 or [AirComplianceReporting@dnr.mo.gov](mailto:AirComplianceReporting@dnr.mo.gov), no later than ten days after any exceedances of the limitations imposed by this permit.

## Attachment A - Monthly Fuel Oils and Used Oil Tracking Record

Landmark Manufacturing Corporation  
 Daviess County, S30, T59N, R26  
 Project Number: 2019-02-034  
 Installation ID Number: 061-0010  
 Permit Number: 0597-009A

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

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H <sup>4</sup>
Date [Month/year]	Monthly Fuel Oil #1 Usage (gallons)	Monthly Fuel Oil #2 Usage (gallons)	Monthly Fuel Oil #3 Usage (gallons)	Monthly Fuel Oil #4 Usage (gallons)	Monthly Fuel Oil #5 Usage (gallons)	Monthly Used Oil Usage (gallons)	Total Oil Burned (gallons):
<b>12-Month Rolling Total gallons of all Oil Burned<sup>5</sup>:</b>							

<sup>4</sup> Column H = Column B + Column C + Column D + Column E + Column F + Column G  
<sup>5</sup> Sum of Column H for the most recent 12 months. A 12-month rolling total of less than 254,777 gallons indicates compliance with Special Condition 2.