



Missouri Department of dnr.mo.gov

# NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

JUN 1 1 2018

Mr. Jonathan Eckles  
Environmental Manager  
Mallinckrodt, LLC  
3600 North Second Street  
St. Louis, MO 63147

RE: New Source Review Permit Amendments  
Project Number: 2018-01-023; Installation Number: 510-0017  
Permit Amendment Numbers: 99-11-078B, 00-05-029A, 01-09-027PM-M, 02-06-013A,  
and 03-01-002PM-A

Dear Mr. Eckles:

On January 18, 2018, the Air Pollution Control Program received a request to modify the visible emission requirements in the Mallinckrodt, LLC's construction and operating permits. The purpose of this request is to update the application of 10 CSR 10 6.220, *Restriction of Emission of Visible Air Contaminants* to emission units at the installation to reflect the applicability of the rule.

The installation currently operates under Operating Permit OP2016-050A, which contains a listing of all applicable construction permits in Appendix 1. During the review of the Operating Permit, some construction permits were found that contain special conditions that apply an opacity limitation plant wide. The original rationale for applying a plant-wide opacity is unknown and is thought to be a misapplication of 10 CSR 10-6.220 by previous staff. The use of plant-wide opacity limits does not follow the applicability of 10 CSR 10-6.220. Because it is believed to be a misapplication, the special conditions listed in Table 1 that applied specific opacity limitations plant wide are being superseded in this permit amendment. In addition, a construction permit was found to contain special conditions that applied an opacity limitation to an emission unit which meets an exemption in the rule, specifically emergency generators. Table 2 contains the permit and special condition that applied specific opacity limitations to an emergency generator and which is also being superseded by this permit amendment

Note that the Table 1 permits do not contain any supporting special conditions regarding monitoring, recordkeeping, or reporting to support the emission limitations, therefore the only special conditions that require amending are those listed.

Table 1: Permits applying opacity limitations plant wide

Permit #	Issuance Date	Special Condition Applying Emission Limitation
99-11-078	9/29/2000	II.B.
01-09-027PM	10/27/2004	II. General Limitations
02-06-013	8/22/2002	III.C.
03-01-002PM	5/16/2006	II.B.



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Mr. Jonathan Eckles  
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Table 2: Permits applying opacity limitations to an emergency generator

Permit #	Issuance Date	Special Condition Applying Emission Limitation (Supporting Conditions)	6.220 Exemption
00-05-029	7/5/2000	III.B. (IV.B.)	(1)(A).

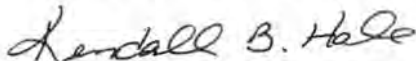
It is important to note that St. Louis City may have ordinances which cover visible emissions. The Missouri Air Pollution Control Program does not have jurisdiction over city ordinances. Therefore, we encourage you to refer to the city ordinances and the City of St. Louis for applicability of any air pollution related ordinances that may still apply to your installation.

If you were 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.oa.mo.gov/ahc](http://www.oa.mo.gov/ahc).

If you have any questions regarding this amendment, please do not hesitate to contact Nicole Weidenbenner, P.E., 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:nwj

Enclosures

c: St. Louis Regional Office  
PAMS File: 2018-01-023

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**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 (12)(A)10. "Conditions required by permitting authority."*

Mallinckrodt, LLC  
St. Louis City County,

1. **Superseding Condition**

The conditions of this permit supersede the following special conditions found in the previously issued construction permits listed below.

- A. Permit # 99-11-078 (issued 9/29/2000), Special Condition II.B.;
- B. Permit #01-09-027PM (issued 10/27/2004), Special Condition II. General Limitations.;
- C. Permit #02-06-013 (issued 8/22/2002), Special Condition III.C.;
- D. Permit #03-01-002PM (issued 5/16/2006), Special Condition II.B.; and
- E. Permit #00-05-029 (issued 7/5/2000), Special Condition III.B..

2. Permit #00-05-029 (issued 7/5/2000), Special Condition IV.B. is amended to the following:

The permittee shall report and record any instances of exceeding the permit limitations.