



## 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:** OP2011-054  
**Expiration Date:** NOV 13 2016  
**Installation ID:** 510-0162  
**Project Number:** 2010-11-009

**Installation Name and Address**

Marquette Tool & Die Co.  
3185 S. Kingshighway  
St. Louis, MO 63139  
St. Louis City

**Parent Company's Name and Address**

Matoo Corp.  
3185 S. Kingshighway  
St. Louis, MO 63139

**Installation Description:**

Marquette Tool and Die Company manufactures appliance and automotive stampings. Raw metal feed, usually in sheet or rod form, is put through various presses to form the different parts. Some of these pieces require solvent degreasing and some multi-piece parts are assembled. This installation is a major source of the single HAP trichloroethylene. Trichloroethylene is the solvent used in the vapor degreasers, and makes the installation subject to 40 CFR Part 63 Subpart T.

NOV 14 2011

Effective Date

  
Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Marquette Tool and Die Company manufactures appliance and automotive stampings. Raw metal feed, usually in sheet or rod form, is put through various presses to form the different parts. Some of these pieces require solvent degreasing and some multi-piece parts are assembled. This installation is a major source of the single HAP trichloroethylene. The vapor degreasers at this installation use trichloroethylene and are subject to 40 CFR Part 63 Subpart T.

Reported Air Pollutant Emissions, tons per year					
Pollutants	2010	2009	2008	2007	2006
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	1				
Particulate Matter ≤ 2.5 Microns (PM <sub>2.5</sub> )					
Sulfur Oxides (SO <sub>x</sub> )					
Nitrogen Oxides (NO <sub>x</sub> )					
Volatile Organic Compounds(VOC)	6.4	4.8	7.4	0.0	9.9
Carbon Monoxide (CO)					
Lead (Pb)					
Hazardous Air Pollutants (HAPs) <sup>2</sup>	6.4	4.8	7.4	0.0	9.9
Ammonia (NH <sub>3</sub> )					

### 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 Point	Emission Point Description	Equipment Number
EP-1	Trichloroethylene ConveyORIZED (existing in-line) Vapor Degreaser, surface to air (S/A) Interface of 24.75 ft <sup>2</sup> , Blakeslee/CVS18	D2
EP-1	Trichloroethylene ConveyORIZED (existing in-line) Vapor Degreaser, S/A Interface of 24.75 ft <sup>2</sup> , Blakeslee/CVS18	D4
EP-1	Trichloroethylene ConveyORIZED (existing in-line) Vapor Degreaser, S/A Interface of 33.75 ft <sup>2</sup> , Blakeslee/CVS18	D6

<sup>1</sup> Blank cells in table indicate no emissions of that pollutant for that year were reported.

<sup>2</sup> HAP emissions are from single HAP, Trichloroethylene, and are also reported as VOCs.

<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>
EP-1	Trichloroethylene ConveyORIZED (existing in-line) Vapor Degreaser, S/A Interface of 33.75 ft <sup>2</sup> , Blakeslee/CVS18	D7
EP-1	Trichloroethylene ConveyORIZED (existing in-line) Vapor Degreaser, S/A Interface of 27.75 ft <sup>2</sup> , Blakeslee/CVS18	D8
EP-1	Trichloroethylene Batch Vapor Degreaser, S/A Interface of 21.1 ft <sup>2</sup> , Blakeslee/D65P	D1
Parts Washer	Dye Machine Shop Parts Washer, 40 gallon, Petroleum Naphtha Solvent, Safety Kleen	

**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.

<b>Emission Point</b>	<b>Emission Point Description</b>	<b>Equipment Number</b>
	Various Small <sup>3</sup> Natural Gas Space Heaters	
	Various Metal Stamping Equipment	

**DOCUMENTS INCORPORATED BY REFERENCE**

These documents have been incorporated by reference into this permit.

- (1) Baron Blakeslee Source Registration, Dated November 10, 1983
- (2) Safety-Kleen Source Registration, Dated January 15, 1992
- (3) Permit to Switch The Degreaser Solvent, Dated June 7, 1993
- (4) Baron Blakeslee ConveyORIZED Vapor Degreaser Permit, Dated June 7, 1993
- (5) Baron Blakeslee Batch Vapor Degreaser, Dated June 7, 1993
- (6) Safety-Kleen Source Registration, Dated October 8, 1993

<sup>3</sup> the combined heat input value is less than 10 mmBtu/hr

## II. Plant Wide Emission Limitations

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

The following requirements apply to all conditions in addition to any other requirements listed in the specific conditions, unless otherwise noted in the specific conditions.

### **Monitoring:**

The permittee shall calibrate, maintain and operate all instruments and control equipment according to the manufacturer's recommendations or according to good engineering practices.

### **Recordkeeping:**

The permittee shall record all required recordkeeping (i.e. inspections and corrective actions) in the appropriate format. Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations.

### **Reporting<sup>4</sup>:**

1. The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance any of the terms imposed by this permit, no later than ten (10) days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition), to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
2. The permittee shall submit an annual certification<sup>5</sup> 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. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. These certifications shall be submitted annually by April 1<sup>st</sup>, 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, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102

Permit Condition PW1 10 CSR 10-6.060 Construction Permit Dated 6-7-93
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### **Emission Limitation:**

The permittee shall not exceed a limit of 100 tons<sup>6</sup> of volatile organic compounds (VOC) total per consecutive twelve (12)-month rolling period. If all VOC emissions are attributed to Trichloroethylene (TCE) usage, then that equates to 16,300 gallons<sup>7</sup>.

### **Monitoring:**

The permittee shall monitor the monthly VOC emissions.

<sup>4</sup> Refer to Section V. General Permit Requirements, 10 CSR 10-6.065(6)(C)1.C General Recordkeeping and Reporting Requirements, page 27, for additional details, including semi-annual reporting of monitoring data.

<sup>5</sup> Refer to Section V. General Permit Requirements, 10 CSR 10-6.065(6)(C)3 Compliance Requirements, page 29, for more details.

<sup>6</sup> Throughout this permit, when the term "tons" is used, English short tons are intended, unless otherwise noted.

<sup>7</sup> This value based on 1.47 grams per cubic centimeter density of Trichloroethylene.

**Recordkeeping:**

1. The permittee shall maintain accurate monthly and twelve (12)-month rolling records of VOC emissions.
2. The permittee shall use Attachments K and L, or their equivalents, for tracking compliance with this condition.

Permit Condition PW2 10 CSR 10-5.300 Control of Emissions From Solvent Metal Cleaning
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**Operational Limitation:**

(3)(C)<sup>8</sup> Operator and Supervisor Training.

1. Only persons trained in at least the operational and equipment requirements specified in this rule for their particular solvent metal cleaning process shall be permitted to operate the equipment.
2. The person who supervises any person who operates solvent cleaning equipment regulated by this rule shall receive equal or greater operational training than the operator.
3. A procedural review shall be given to all solvent metal cleaning equipment operators at least once each twelve (12) months.
4. Training records shall be maintained per Subsections (4)(D) and (4)(E) of this rule.

**Recordkeeping:**

A record shall be kept of solvent metal cleaning training required by Subsection (3)(C) of this rule. The permittee shall use Attachment G, or its equivalent, for tracking compliance with this condition.

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<sup>8</sup> Throughout the permit where a rule or regulation wording is used, the rule or regulation outline numbering is used when possible.

### 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>Trichloroethylene Degreasers</b>			
<i>Emission Unit</i>	ID	Description	Control Devices
EP-1	<i>D2</i>	Trichloroethylene Conveyorized (existing in-line) Vapor Degreaser, surface to air (S/A) Interface of 24.75 ft <sup>2</sup> , Blakeslee/CVS18	
	<i>D4</i>	Trichloroethylene Conveyorized (existing in-line) Vapor Degreaser, S/A Interface of 24.75 ft <sup>2</sup> , Blakeslee/CVS18	
	<i>D6</i>	Trichloroethylene Conveyorized (existing in-line) Vapor Degreaser, S/A Interface of 33.75 ft <sup>2</sup> , Blakeslee/CVS18	
	<i>D7</i>	Trichloroethylene Conveyorized (existing in-line) Vapor Degreaser, S/A Interface of 33.75 ft <sup>2</sup> , Blakeslee/CVS18	
	<i>D8</i>	Trichloroethylene Conveyorized (existing in-line) Vapor Degreaser, S/A Interface of 27.75 ft <sup>2</sup> , Blakeslee/CVS18	
	<i>D1</i>	Trichloroethylene Batch Vapor Degreaser, S/A Interface of 21.1 ft <sup>2</sup> , Blakeslee/D65P	

Trichloroethylene Degreasers Permit Condition 1  
 10 CSR 10-6.075, Maximum Achievable Control Technology Regulations  
 40 CFR Part 63 Subpart T, National Emission Standards for Halogenated Solvent Cleaning

**Emission Limitation:**

**§ 63.464 Alternative standards.<sup>9</sup>**

(a) As an alternative to meeting the requirements in §63.463, each owner or operator of a batch vapor or in-line solvent cleaning machine can elect to comply with the requirements of §63.464. An owner or operator of a solvent cleaning machine who elects to comply with §63.464 shall comply with the requirements specified in either Paragraph (a)(1) or (a)(2) of this section.

(1) If the cleaning machine has a solvent/air interface, as defined in §63.461, the owner or operator shall comply with the requirements specified in Paragraphs (a)(1)(i) and (a)(1)(ii) of this section.

(i) Maintain a log of solvent additions and deletions for each solvent cleaning machine.

(ii) Ensure that the emissions from each solvent cleaning machine are equal to or less than the applicable emission limit presented in Table 5 of this subpart as determined using the procedures in §63.465(b) and (c).

<sup>9</sup> The owner or operator has elected to comply with the alternative standard for batch vapor and in-line solvent cleaning machines in §63.464 as an alternative to the requirements in §63.463.

**Table 5—Emission Limits for Batch Vapor and In-Line Solvent Cleaning Machines With a Solvent/Air Interface**

Solvent cleaning machine	3-month rolling average monthly emission limit (kilograms/square meters/month)
Batch vapor solvent cleaning machines	150
Existing in-line solvent cleaning machines	153
New in-line solvent cleaning machines	99

**Monitoring:**

**§ 63.465 Test methods.**

(b) Except as provided in Paragraph (g) of this section for continuous web cleaning machines, each owner or operator of a batch vapor or in-line solvent cleaning machine complying with §63.464 shall, on the first operating day of every month ensure that the solvent cleaning machine system contains only clean liquid solvent. This includes, but is not limited to, fresh unused solvent, recycled solvent, and used solvent that has been cleaned of soils. A fill line must be indicated during the first month the measurements are made. The solvent level within the machine must be returned to the same fill-line each month, immediately prior to calculating monthly emissions as specified in Paragraph (c) of this section. The solvent cleaning machine does not have to be emptied and filled with fresh unused solvent prior to the calculations.

(c) Except as provided in Paragraphs (f) and (g) of this section for continuous web cleaning machines, each owner or operator of a batch vapor or in-line solvent cleaning machine complying with §63.464 shall, on the first operating day of the month, comply with the requirements specified in Paragraphs (c)(1) through (3) of this section.

(1) Using the records of all solvent additions and deletions for the previous monthly reporting period required under §63.464(a), determine solvent emissions ( $E_i$ ) using equation 2 for cleaning machines with a solvent/air interface and equation 3 for cleaning machines without a solvent/air interface:

$$E_i = \frac{SA_i - LSR_i - SSR_i}{AREA_i} \quad (2) \qquad E_n = SA_i - LSR_i - SSR_i \quad (3)$$

where:

$E_i$ =the total halogenated HAP solvent emissions from the solvent cleaning machine during the most recent monthly reporting period i, (kilograms of solvent per square meter of solvent/air interface area per month).

$E_n$ =the total halogenated HAP solvent emissions from the solvent cleaning machine during the most recent monthly reporting period i, (kilograms of solvent per month).

$SA_i$ =the total amount of halogenated HAP liquid solvent added to the solvent cleaning machine during the most recent monthly reporting period i, (kilograms of solvent per month).

$LSR_i$ =the total amount of halogenated HAP liquid solvent removed from the solvent cleaning machine during the most recent monthly reporting period i, (kilograms of solvent per month).

$SSR_i$  = the total amount of halogenated HAP solvent removed from the solvent cleaning machine in solid waste, obtained as described in Paragraph (c)(2) of this section, during the most recent monthly reporting period  $i$ , (kilograms of solvent per month).

$AREA_i$  = the solvent/air interface area of the solvent cleaning machine (square meters).

(2) Determine  $SSR_i$  using the method specified in Paragraph (c)(2)(i) or (c)(2)(ii) of this section.

(i) From tests conducted using EPA reference method 25d.

(ii) By engineering calculations included in the compliance report.

(3) Determine the monthly rolling average, EA, for the 3-month period ending with the most recent reporting period using equation 4 for cleaning machines with a solvent/air interface or equation 5 for cleaning machines without a solvent/air interface:

$$EA_i = \frac{\sum_{j=1}^3 E_i}{3} \qquad (4) \quad EA_n = \frac{\sum_{j=1}^3 E_n}{3} \qquad (5)$$

Where:

$EA_i$  = the average halogenated HAP solvent emissions over the preceding 3 monthly reporting periods, (kilograms of solvent per square meter of solvent/air interface area per month).

$EA_n$  = the average halogenated HAP solvent emissions over the preceding 3 monthly reporting periods (kilograms of solvent per month).

$E_i$  = halogenated HAP solvent emissions for each month ( $j$ ) for the most recent 3 monthly reporting periods (kilograms of solvent per square meter of solvent/air interface area).

$E_n$  = halogenated HAP solvent emissions for each month ( $j$ ) for the most recent 3 monthly reporting periods (kilograms of solvent per month).

$j=1$  = the most recent monthly reporting period.

$j=2$  = the monthly reporting period immediately prior to  $j=1$ .

$j=3$  = the monthly reporting period immediately prior to  $j=2$ .

**Recordkeeping:**

**§ 63.467 Recordkeeping requirements.**

(c) Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the provisions of §63.464 shall maintain records specified in Paragraphs (c)(1) through (3) of this section either in electronic or written form.

(1) The dates and amounts of solvent that are added to the solvent cleaning machine.

(2) The solvent composition of wastes removed from cleaning machines as determined using the procedure described in §63.465(c)(2).

(3) Calculation sheets showing how monthly emissions and the rolling 3-month average emissions from the solvent cleaning machine were determined, and the results of all calculations.

**The permittee shall use appropriately Attachments H, I and J, or their equivalents, for tracking compliance with this condition.**

**Reporting:**

**§ 63.468 Reporting requirements.**

(g) Each owner or operator of a batch vapor or in-line solvent cleaning machine complying with the provisions of §63.464 shall submit a solvent emission report every year. This solvent emission report shall contain the requirements specified in Paragraphs (g)(1) through (g)(4) of this section.

(1) The size and type of each unit subject to this subpart (solvent/air interface area or cleaning capacity).

(2) The average monthly solvent consumption for the solvent cleaning machine in kilograms per month.

(3) The 3-month monthly rolling average solvent emission estimates calculated each month using the method as described in §63.465(c).

(4) The reports required under Paragraphs (f) and (g) of this section can be combined into a single report for each facility.

D2, D4, D6, D7 & D8 (Conveyorized) Permit Condition 2 10 CSR 10-5.300 Control of Emissions From Solvent Metal Cleaning
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**Equipment Specification:**

(3)(A)3. Conveyorized degreasers.

A. Each conveyorized degreaser shall have a drying tunnel or rotating (tumbling) basket or other means demonstrated to have equal to or better control which shall be used to prevent cleaned parts from carrying out solvent liquid or vapor.

B. Each conveyorized degreaser shall have the following safety devices which operate if the machine malfunctions:

(I) A vapor level control device that shuts off the heating source when the vapor level rises just above the cooling or condensing coil; and

(II) A spray safety switch, which shuts off the spray pump if the vapor level in the spray chamber drops four inches (4"), for conveyorized degreasers utilizing a spray chamber; or

(III) Equivalent safety devices approved by the Director and EPA.

C. Entrances and exits shall silhouette workloads so that the average clearance between parts and the edge of the degreaser opening is less than four inches (4") or less than ten percent (10%) of the width of the opening.

D. Covers shall be provided for closing off the entrance and exit during hours when the degreaser is not being used.

E. A permanent, conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment.

F. If the air/vapor interface is larger than twenty-one and one-half (21 1/2) square feet, one (1) major control device shall be required. This device shall be one (1) of the following:

(I) A refrigerated chiller;

(II) Carbon adsorption system with ventilation of at least fifty (50) cubic feet per minute per square foot of the total entrance and exit areas (when downtime covers are open) and exhausting less than twenty-five (25) ppm of solvent by volume averaged over one (1) complete adsorption cycle as measured using the reference method specified at 10 CSR 10-6.030(14)(A); or

(III) A control system with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to sixty-five percent (65%) and prior approval by the Director and EPA.

**Operational Limitation:**

(3)(B)3. Conveyorized degreasers.

A. Ventilation exhaust from the conveyorized degreaser shall not exceed sixty-five (65) cubic feet per minute per square foot of conveyorized degreaser opening unless proof is submitted that it is necessary to meet OSHA requirements. Fans shall not be used near the conveyorized degreaser opening.

B. Solvent carry-out shall be minimized in the following ways:

(I) Parts shall be racked, if practical, to allow full drainage; and

(II) Vertical conveyor speed shall be maintained at less than eleven feet (11') per minute.

C. Whenever a conveyorized degreaser fails to perform within the rule operating requirements, the unit shall be shut down immediately and shall remain shutdown until operation is restored to meet the rule operating requirements.

D. Solvent leaks shall be repaired immediately or the conveyorized degreaser shall be shut down until the leaks are repaired.

E. Water shall not be visually detectable in solvent exiting the water separator.

F. Covers shall be placed over entrances and exits immediately after conveyor and exhaust are shut down and removed just before they are started up.

G. Any waste material removed from a conveyorized degreaser shall be disposed of by one (1) of the following methods or an equivalent method approved by the Director and EPA:

(I) Reduction of the waste material to less than twenty percent (20%) VOC solvent by distillation and proper disposal of the still bottom waste; or

(II) Stored in closed containers for transfer to—

(a) A contract reclamation service; or

(b) A disposal facility approved by the Director and EPA.

H. Waste solvent shall be stored in closed containers only.

**Recordkeeping:**

(4)(A) The owner or operator of a solvent metal cleaning or degreasing operation shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. The records also shall include maintenance and repair logs for both the degreaser and any associated control equipment. These records shall be kept current and made available for review on a monthly basis. The Director may require additional recordkeeping if necessary to adequately demonstrate compliance with this rule.

**The permittee shall use appropriately Attachments D, E and F, or their equivalents, for tracking compliance with this condition.**

D1 (Open Top) Permit Condition 3 10 CSR 10-5.300 Control of Emissions From Solvent Metal Cleaning
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**Equipment Specification:**

(3)(A)2. Open-top vapor degreasers.

A. Each open-top vapor degreaser shall have a cover that will prevent the escape of solvent vapors from the degreaser while in the closed position and shall be designed to open and close easily such that minimal disturbing of the solvent vapors in the tank occurs. For covers larger than ten (10) square feet, easy cover use shall be accomplished by either mechanical assistance, such as spring loading or counter weighing or by power systems.

B. Each open-top vapor degreaser shall be equipped with a vapor level control device that shuts off the heating source when the vapor level rises above the cooling or condensing coil, or an equivalent safety device approved by the Director and EPA.

C. Each open-top vapor degreaser with an air/vapor interface over ten and three-fourths (10 3/4) square feet shall be equipped with at least one (1) of the following control devices:

(I) A freeboard ratio of at least 0.75;

(II) A refrigerated chiller;

(III) An enclosed design (the cover or door opens only when the dry part actually is entering or exiting the degreaser);

(IV) A carbon adsorption system with ventilation of at least fifty (50) cubic feet per minute per square foot of air vapor area when the cover is open and exhausting less than twenty-five parts per million (25 ppm) of solvent by volume averaged over one (1) complete adsorption cycle as measured using the reference method specified at 10 CSR 10- 6.030(14)(A); or

(V) A control system with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to sixty-five percent (65%) and prior approval by the Director and EPA.

D. A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment.

**Operational Limitation:**

(3)(B)2. Open-top vapor degreasers.

A. The cover shall be kept closed at all times except when processing workloads through the open-top vapor degreaser, performing maintenance or collecting solvent samples.

B. Solvent carry-out shall be minimized in the following ways:

(I) Parts shall be racked, if practical, to allow full drainage;

(II) Parts shall be moved in and out of the open-top vapor degreaser at less than eleven feet (11') per minute;

(III) Workload shall remain in the vapor zone at least thirty (30) seconds or until condensation ceases, whichever is longer;

(IV) Pools of solvent shall be removed from cleaned parts before removing parts from the open-top vapor degreaser freeboard area; and

(V) Cleaned parts shall be allowed to dry within the open-top vapor degreaser freeboard area for at least fifteen (15) seconds or until visually dry, whichever is longer.

C. Porous or absorbent materials such as cloth, leather, wood or rope shall not be degreased.

D. If workloads occupy more than half of the open-top vapor degreaser's open-top area, rate of entry and removal shall not exceed five feet (5') per minute.

E. Spray shall never extend above vapor level.

F. Whenever an open-top vapor degreaser fails to perform within the rule operating requirements, the unit shall be shut down until operation is restored to meet the rule operating requirements.

G. Solvent leaks shall be repaired immediately or the open-top vapor degreaser shall be shut down until the leaks are repaired.

H. Ventilation exhaust from the open-top vapor degreaser shall not exceed sixty-five (65) cubic feet per minute per square foot of the open-top vapor degreaser open area unless proof is submitted that it is necessary to meet Occupational Safety and Health Administration (OSHA) requirements. Fans shall not be used near the open-top vapor degreaser opening.

I. Water shall not be visually detectable in solvent exiting the water separator, except for automatic water separators that by configuration do not allow visual inspection.

J. Any waste material removed from an open-top vapor degreaser shall be disposed of by one (1) of the following methods or an equivalent method approved by the Director and EPA:

- (I) Reduction of the waste material to less than twenty percent (20%) VOC solvent by distillation and proper disposal of the still bottom waste; or
- (II) Stored in closed containers for transfer to—
  - (a) A contract reclamation service; or
  - (b) A disposal facility approved by the Director and EPA.

K. Waste solvent shall be stored in closed containers only.

**Recordkeeping:**

(4)(A) The owner or operator of a solvent metal cleaning or degreasing operation shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. The records also shall include maintenance and repair logs for both the degreaser and any associated control equipment. These records shall be kept current and made available for review on a monthly basis. The Director may require additional recordkeeping if necessary to adequately demonstrate compliance with this rule.

**The permittee shall use appropriately Attachments D, E and F, or their equivalents, for tracking compliance with this condition.**

<b>Cold Cleaner</b>		
<i>Emission Unit</i>	Description	Control Devices
<i>Parts Washer</i>	Dye Machine Shop Parts Washer, 40 gallon, Petroleum Naphtha Solvent, Safety Kleen	

Cold Cleaner Permit Condition 1 10 CSR 10-5.300 Control of Emissions From Solvent Metal Cleaning
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**Equipment Specification:**

(3)(A)1. Cold cleaners.

A. No one shall use, sell or offer for sale for use within the City of St. Louis and St. Charles, St. Louis, Jefferson and Franklin Counties a cold cleaning solvent with a vapor pressure greater than 1.0 mmHg (0.019 psi) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)) unless used for carburetor cleaning.

B. No one shall use, sell or offer for sale for use within the City of St. Louis and St. Charles, St. Louis, Jefferson and Franklin Counties a cold cleaning solvent for the purpose of carburetor cleaning with a vapor pressure greater than 5.0 mmHg (0.097 psi) at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)).

C. Each cold cleaner shall have a cover which prevents the escape of solvent vapors from the solvent bath while in the closed position or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner.

D. An owner or operator of a cold cleaner may use an alternate method for reducing cold cleaning emissions if the owner or operator shows the level of emission control is equivalent to or greater than the requirements of Subparagraphs (3)(A)1.A. and (3)(A)1.B. of this rule. This alternate method must be approved by the Director and the U.S. Environmental Protection Agency (EPA).

E. When one (1) or more of the following conditions exist, the cover shall be designed to operate

easily such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than ten (10) square feet, this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems):

- (I) The solvent vapor pressure is greater than 0.3 psi measured at thirty-seven point eight degrees Celsius (37.8°C) (one hundred degrees Fahrenheit (100°F));
- (II) The solvent is agitated; or
- (III) The solvent is heated.

F. Each cold cleaner shall have an internal drainage facility so that parts are enclosed under the cover while draining.

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

H. Solvent sprays, if used, shall be a solid fluid stream (not a fine, atomized or shower-type spray) and at a pressure which does not cause splashing above or beyond the freeboard.

I. A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment.

J. Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at thirty-seven point eight degrees Celsius (37.8°C) (one hundred degrees Fahrenheit (100°F)) or heated above forty-eight point nine degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)) must use one (1) of the following control devices:

- (I) A freeboard ratio of at least 0.75;
- (II) Water cover (solvent must be insoluble in and heavier than water); or
- (III) Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to sixty-five percent (65%). These control systems must receive approval from the Director and EPA prior to their use.

**Operational Limitation:**

(3)(B)1. Cold cleaners.

A. Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent must drain into an enclosed reservoir except when performing maintenance or collecting solvent samples.

B. Cleaned parts shall be drained in the freeboard area for at least fifteen (15) seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner.

C. Whenever a cold cleaner fails to perform within the rule operating requirements, the unit shall be shut down immediately and shall remain shut down until operation is restored to meet the rule operating requirements.

D. Solvent leaks shall be repaired immediately or the cold cleaner shall be shut down until the leaks are repaired.

E. Any waste material removed from a cold cleaner shall be disposed of by one (1) of the following methods or an equivalent method approved by the Director and EPA:

- (I) Reduction of the waste material to less than twenty percent (20%) VOC solvent by distillation and proper disposal of the still bottom waste; or
- (II) Stored in closed containers for transfer to—
  - (a) A contract reclamation service; or

(b) A disposal facility approved by the Director and EPA.

F. Waste solvent shall be stored in closed containers only.

**Recordkeeping:**

(4)(A) The owner or operator of a solvent metal cleaning or degreasing operation shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. The records also shall include maintenance and repair logs for both the degreaser and any associated control equipment. These records shall be kept current and made available for review on a monthly basis. The Director may require additional recordkeeping if necessary to adequately demonstrate compliance with this rule.

(B) All persons that use any solvent subject to the requirements of Subparagraph (3)(A)1.A. or (3)(A)1.B. of this rule shall maintain records which include for each purchase of cold cleaning solvent:

1. The name and address of the solvent supplier;
2. The date of purchase;
3. The type of solvent; and
4. The vapor pressure of the solvent in mmHg at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)).

(C) All persons that sell or offer for sale any solvent subject to the requirements of subparagraph (3)(A)1.A. or (3)(A)1.B. of this rule shall maintain records which include for each sale of cold cleaning solvent:

1. The name and address of the solvent purchaser;
2. The date of sale;
3. The type of solvent;
4. The unit volume of solvent;
5. The total volume of solvent; and
6. The vapor pressure of the solvent measured in mmHg at twenty degrees Celsius (20°C) (sixty-eight degrees Fahrenheit (68°F)).

**The permittee shall use appropriately Attachments D, E and F, or their equivalents, for tracking compliance with this condition.**

## 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**

#### **City of St. Louis Ordinance 68657 (see subparagraph St. Louis Metropolitan Area below)**

- 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.
  - (1) Open burning is prohibited in the City of St. Louis by City Ordinance 68657.
  - (2) 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) Marquette Tool & Die Co. 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 Marquette Tool & Die Co. 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 Recordkeeping. 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 10-6.100 Alternate Emission Limits**

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

**10 CSR 10-6.110 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<sup>10</sup>:

- 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 A, 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.

<sup>10</sup> The permittee may continue their current monitoring schedule, through the renewed operating permit issuance.

**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 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited**

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

**10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations  
(Contained in State Implementation Plan)**

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

**10 CSR 10-5.120 Information on Sales of Fuels to be Provided and Maintained**

Every delivery of coal or residual fuel oil when first delivered to a consumer or wholesaler in the St. Louis metropolitan area must be accompanied by a ticket prepared in triplicate and containing at least the name and address of the seller and the buyer; the grade of fuel; ash content of coal, the source of the fuel, which must be an approved source, and such other information as the Air Conservation Commission may require. One copy of each ticket shall be kept by the person delivering the fuel and be retained for one year; one copy is to be given to the recipient of the fuel to be retained for one year; and, upon request, within 30 days after delivery of the fuel, the delivering party shall mail one copy to the Air Conservation Commission.

**10 CSR 10-5.130 Certain Coals to be Washed**

The permittee shall not import, sell, offer for sale, expose for sale, exchange, deliver or transport for use and consumption in the St. Louis metropolitan area or use or consume in the said area any coal which as mined containing in excess of 2.0 percent sulfur or 12.0 percent ash calculated as described in 10 CSR 10-5.110, unless it has been cleaned by a process known as "washing" so that it shall contain no more than 12.0 percent ash on a dry basis. The term "washing" is meant to include purifying, cleaning, or removing impurities from coal by mechanical process, regardless of cleaning medium used.

**10 CSR 10-6.165 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 (1) volume of odorous air is diluted with seven (7) volumes of odor-free air for two (2) separate trials not less than fifteen (15) minutes apart within the period of one (1) hour. This odor evaluation shall be taken at a location outside of the installation's property boundary.

**10 CSR 10-5.160 Control of Odors in the Ambient Air**

**This requirement is not federally enforceable.**

No person shall emit odorous matter as to cause an objectionable odor on or adjacent to:

- 1) Residential, recreational, institutional, retail sales, hotel or educational premises.
- 2) Industrial premises when air containing odorous matter is diluted with 20 or more volumes of odor-free air; or
- 3) Premises other than those in 1) and 2) above when air containing odorous matter is diluted with four or more volumes of odor-free air.

The previously mentioned requirement shall apply only to objectionable odors. An odor will be deemed objectionable when 30 percent or more of a sample of the people exposed to it believe it to be objectionable in usual places of occupancy; the sample size to be at least 20 people or 75 percent of those exposed if fewer than 20 people are exposed.

**10 CSR 10-5.240 Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area**

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:

- 1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.
- 2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

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

**Emission Limitation:**

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain conditions identifying the opacity limits (e.g. 10, 20 or 40 percent) for the specific emission units, if any exist.

**Monitoring:**

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are 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 permittee must maintain the following monitoring schedule<sup>11</sup>:
  - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
  - b) Should the permittee observe no violations of this regulation during this period then-
    - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
    - ii) If a violation is noted, monitoring reverts to weekly.
    - iii) Should no violation of this regulation be observed during this period then-
      - (1) The permittee may observe once per month.
      - (2) If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

**Recordkeeping:**

The permittee shall maintain records of all observation results using the appropriate forms, Attachment B or C (or their equivalent), noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;
- 3) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all U.S. EPA Method 9 opacity tests performed.

**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

<sup>11</sup> The permittee may continue their current monitoring schedule, through the renewed operating permit issuance.

- 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 recordkeeping 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 Recordkeeping and Reporting Requirements**

- 1) Recordkeeping
  - 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 City of St. Louis Dept. of Health, Air Pollution Control Program, 1520 Market St., Room 4058, St. Louis, MO 63103; and 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 semiannually 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, recordkeeping, 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 semiannual 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 semiannually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, as well as to: City of St. Louis Dept. of Health, Air Pollution Control Program, 1520 Market St., Room 4058, St. Louis, MO 63103;

and 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: City of St. Louis Dept. of Health, Air Pollution Control Program, 1520 Market St., Room 4058, St. Louis, MO. 63103; and 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), recordkeeping, reporting or compliance requirements of the permit.
  - a) Before making a change under this provision, The permittee shall provide advance written notice to: City of St. Louis Dept. of Health, Air Pollution Control Program, 1520 Market St., Room 4058, St. Louis, MO 63103; and, 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 Gerald Richardson, Plant Engineer. 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.

<b>10 CSR 10-6.065(6)(E)1.C Statement of Basis</b>
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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**

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

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

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



















## 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 February 1, 2005
- (2) 2003 Emissions Inventory Questionnaire, received March 31, 2004;
- (3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

### Construction Permits / Source Registrations

- (1) City Source Registration for Baron Blakeslee Vapor Degreasers, dated November 10, 1983
- (2) City Source Registration for Parts washer, dated January 15, 1992
- (3) City Source Registration for Baron Blakeslee Conveyorized Vapor Degreasers, dated June 7, 1993
- (4) City Source Registration for Baron Blakeslee Batch Vapor Degreaser, dated June 7, 1993
- (5) City Source Registration Permit to switch degreaser solvent from "Trichloroethane" to "Trichloroethylene", dated June 7, 1993
- (6) City Source Registration for Parts washer, dated March 4, 2002

### 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 10-5.520, *Control of Volatile Organic Compound Emissions From Existing Major Sources*

This rule applies to existing installations with the potential to emit greater than one hundred (100) tons per year of volatile organic compounds. A simple calculation of potential to emit of VOC results in a rate of about 212 tons per year. However, looking at the VOC emission history of this facility, the last six years have been below 10 tons per year, indicates that there are other, inherent physical limits acting that should be considered. ***It is apparent that this installation is not a major source of VOC.*** The installation is a major source of HAP, and thus affected by 40 CFR Part 63.

### Construction Permit Revisions

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

#### *Air Pollution Control Division, Construction Permit 6-7-93*

This construction permit was issued with special conditions intended to insure that the permittee did not exceed the major source construction permit levels in a nonattainment area (which would trigger LAER review, among other requirements), and mimic the permit application. The following lists the special conditions:

1. *The total of nine vapor degreasers, including two portables shall be allowed to operate at 3185 South Kingshighway, St. Louis, Missouri.*

2. *The degreasers are the Baron-Blakeslee (Model #CVS-18), with a cooling coil as a control device.*
3. *The water in the cooling coil must be in circulation prior to any parts entering the degreaser.*
4. *The operational limitations as listed below:*
  - *Usage of Tri-chloroethylene shall not exceed a limit of 1375 gallons (monthly) and/or 16,500 gallons annually.*
  - *Actual operation of the degreasers shall not exceed a limit of 4000 hours per unit.*
  - *Normal operation: 16 hrs/day, 5 days/week, 50 weeks/year.*
5. *Recordkeeping:*
  - A. *Adequate records must be kept to verify the permit conditions and/or compliances monthly.*
  - B. *Monthly records of consumption of Tri-chloroethylene must be maintained.*
  - C. *Monthly records of operational hours of each degreaser must be maintained.*
  - D. *The records required under 5B & C shall be retained for a minimum of two (2) years.*
  - E. *These records shall be available and submitted annually or upon request to this Division.*

This operating permit is revisiting the foundation of the special conditions and requesting comment on the changes.

First, the permittee is being limited to a plant-wide emission limit of 100 tons of volatile organic compounds (VOCs). Converting all Trichloroethylene (TCE) as VOCs and using 1.47 grams per cubic centimeter as the density for TCE that translates to 16,300 gallons. However, the permittee must add any other VOCs emitted to determine the totals.

Second, the monthly limit of 1375 gallons is removed. The 100 ton major source threshold is a 12-month total value. This limit is replaced with a 12-month rolling total, such that compliance can be determined on a monthly basis.

The permitting authority turned the permittee's statement of normal operation (*16 hrs/day, 5 days/week, 50 weeks/year*) into an annual hours of operation limit (*16 hrs/day \* 5 days/week \* 50 weeks/year*). This was not necessary, nor the intention of the permittee when completing the application. This special condition does not explain how it is to be interpreted: are the 4000 hours per machine additive and shared (nine machines equals 36,000 hours)?; are the 4000 hours per month, three months, one year, 12 months?; is each machine supposed to have an electronic time keeper attached for tracking purposes?. The 4000 hours per unit limit is removed in this operating permit as unenforceable.

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

The installation is not subject to any NSPS regulations.

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

40 CFR Part 63, Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*

Each one of the vapor degreasers at this installation uses the overall emission limit for batch and in-line vapor degreasers to comply with requirements of §63.464 as an alternative to the equipment requirements and work practice standards in §63.463. The subsequent records that are required to comply with §63.464 should be kept to show compliance with the emission limits. Recordkeeping forms for these recordkeeping requirements have been included in the operating permit. All of the vapor degreasers at this installation have a solvent/air (S/A) interface, with this in mind the sections

of this subpart that dealt with machines without a S/A interface were not included in the operating permit. The requirements for new cleaning units were not included in the operating permit, since all the vapor degreasers at this installation are existing units.

**§ 63.460 Applicability and designation of source.**

*(c) Except as provided in Paragraph (g) of this section, each solvent cleaning machine subject to this subpart that commenced construction or reconstruction after November 29, 1993 shall achieve compliance with the provisions of this subpart, except for §63.471, immediately upon start-up or by December 2, 1994, whichever is later.*

The permittee's degreasers were constructed prior to the November 29, 1993 applicability date, therefore §63.471 is not applied to this facility.

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

None

**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.

CAM does not apply to this installation because 40 CFR Part 63, Subpart T, promulgated in 1994, is applicable to the degreasers at this installation.

**Greenhouse Gas Emissions (GHG)**

This installation is not a major source for greenhouse gases. At the time of permit issuance, there were no applicable GHG requirements for this source.

Note that this source is not subject to the Greenhouse Gas Reporting Rule. In addition, Missouri regulations do not require the installation to report CO<sub>2</sub> emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation's CO<sub>2</sub> emissions were not included within this permit.

**Other Regulatory Determinations**

10 CSR 10-5.030, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

This installation has various small space heaters that are run solely on natural gas. Combined these space heaters have a heat input value below ten MMBTU per hour. Due to the nature of the fuel used in the space heater and the small heat input values, these units would never be expected to exceed the applicable PM limit under this rule.

10 CSR 10-5.300, *Control of Emissions From Solvent Metal Cleaning*

The cold cleaners at this installation comply with the vapor pressure requirements of this rule by using Petroleum Naphtha solvent with a vapor pressure of 0.2 mmHg at twenty degrees Celsius in both cold cleaners. Due to the vapor pressure of the solvent used in the cold cleaners, they are not required to use any control devices that are required for cold cleaners that use a solvent that has a vapor pressure greater than 0.6 psi at 100 degrees F. Therefore, the control device requirements were not included in the operating permit. The cold cleaners at this installation are not used to clean spray guns or carburetors, so the requirements in this rule for those operations were not included in

the operating permit. The cold cleaners also have internal drainage facilities, so the requirements in the rule for external drainage facilities were not included in the operating permit. All of the vapor degreasers at this installation utilize condensers or chillers for a control device, because the machines use chillers the other control options for vapor degreasers in this rule were not included in the operating permit. None of the vapor degreasers at this installation utilize a solvent spray; therefore the requirements in 10 CSR 10-5.300 for machines with solvent sprays were not included in the operating permit.

**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.

**Summary**

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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