



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: OP2011-057
Expiration Date: NOV 30 2016
Installation ID: 099-0044
Project Number: 2011-01-016

Installation Name and Address

Metal Container Corporation
42 Tenbrook Industrial Park
Arnold, MO 63010
Jefferson County

Parent Company's Name and Address

Anheuser-Busch Companies, Inc.
One Busch Place
St. Louis, MO 63118

Installation Description:

Metal Container Corporation produces aluminum cans in Arnold, Missouri. The installation manufactures two-piece aluminum beverage cans. Operations include can forming, coating, drying, and curing. Coating operations include basecoat, ink, over varnish, bottom varnish, and inside spray. The installation is a major source of Carbon Monoxide (CO), Nitrogen Oxides (NO_x), Particulate Matter ≤ 10 microns (PM₁₀), Particulate Matter ≤ 2.5 microns (PM_{2.5}), and Volatile Organic Compounds (VOCs). The installation is a synthetic minor source of Hazardous Air Pollutants (HAPs) and Glycol Ethers (CAS No. 20-10-0).

DEC 01 2011

Effective Date


Director of Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Metal Container Corporation produces aluminum cans in Arnold, Missouri. The installation manufactures two-piece aluminum beverage cans. Operations include can forming, coating, drying, and curing. Coating operations include basecoat, ink, over varnish, bottom varnish, and inside spray. The installation is a major source of Carbon Monoxide (CO), Nitrogen Oxides (NO_x), Particulate Matter ≤ 10 microns (PM₁₀), Particulate Matter ≤ 2.5 microns (PM_{2.5}), and Volatile Organic Compounds (VOCs). The installation is a synthetic minor source of Hazardous Air Pollutants (HAPs) and Glycol Ethers (CAS No. 20-10-0).

Reported Air Pollutant Emissions, tons per year					
Pollutant	2010	2009	2008	2007	2006
Particulate Matter ≤ Ten Microns (PM ₁₀)	2.73	2.64	2.79	2.26	2.23
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	2.73	2.64	2.79	2.26	2.23
Sulfur Oxides (SO _x)	0.07	0.07	0.07	0.06	0.06
Nitrogen Oxides (NO _x)	11.59	11.27	11.26	10.50	10.07
Volatile Organic Compounds (VOC)	108.29	106.25	111.91	110.37	109.74
Carbon Monoxide (CO)	9.71	9.44	9.43	8.82	8.45
Hazardous Air Pollutants (HAPs) ¹	19.86	19.86	19.86	16.99	19.70
Glycol Ethers (20-10-0) ¹	18.12	18.12	18.12	15.83	18.41
Xylene (1330-20-7)	1.20	1.20	1.20	0.70	0.75
Ethylbenzene (100-41-4)	0.28	0.28	0.28	0.18	0.19
Chromium Compounds (20-06-4)	0.16	0.16	0.16	0.09	0.06
Ethylene Glycol (107-21-1)	0.06	0.06	0.06	-	0.09
Formaldehyde (50-00-0)	0.02	0.02	0.02	0.19	0.19
Hydrogen Fluoride (7664-39-3)	0.02	0.02	0.02	-	-

¹The facility has been incorrectly reporting all glycol ethers as hazardous air pollutants rather than just ethylene glycol ethers and diethylene glycol ethers. The totals within this table are the values reported within the installation's Missouri Emissions Inventory Questionnaire.

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit	Description
B001	(9) Make-Up Air Units, 40.9 MMBtu/hr total
B002	1.75 MMBtu/hr Fire Water Heater
B003	(3) 6.3 MMBtu/hr Boilers
B004	2.6 MMBtu/hr Water Heater
B006	(21) Space Heaters, 2.5 MMBtu/hr total
E001	Back-Up Fire Pump
P001	(4) Cuppers
P002	(4) Wet Can Elevators and (28) Bodymakers
P004	(3) Basecoaters and (3) 1.3 MMBtu/hr Basecoater Ovens
P005	Printers: Line 1, Line 2, Line 3, and (2) on Line 4
	1.3 MMBtu/hr Printer Ovens: Line 1, Line 2, Line 3, and (2) on Line 4
P006	Varnishers: Line 1, Line 2, Line 3, and (2) on Line 4
	Inside Spray Machines: Line 1, Line 2, Line 3, Line 4, and Respray
	4.2 MMBtu/hr Inside Spray Bake Ovens: Line 1, Line 2, Line 3, and Line 4

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.

Emission Unit	Description
B005	13.5 MMBtu/hr Catalytic Oxidizer
F001	Clean-Up Solvent Fugitives
M001	Grinder
P003	Can Washer Ovens, 6.6 MMBtu/hr
T001	10,000 gallon D&I Lube Bulk Tank
T002	10,000 gallon Basecoat Bulk Tank
T002A	500 gallon Basecoat Day Tank
T003	10,000 gallon Varnish Bulk Tank
T003A	(2) 500 gallon Varnish Day Tanks
T004	10,000 gallon Inside Spray Bulk Tank
T004A	(3) 500 gallon Inside Spray Day Tanks
T008	(3) 3,000 gallon Waste Oil Tanks
-	900 gallon Diesel Storage Tank
-	1,000 gallon Diesel Storage Tank

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001

10 CSR 10-6.060 Construction Permits Required
Construction Permit 0279-001, Issued February 1, 1979

Emission Limitation:

1. Special Condition 2: Hydrocarbon emissions from the plant at capacity production shall not exceed 560 TPY.
2. Special Condition 4: Monthly hydrocarbon emissions are limited to
 - a) 46 tons for the months of February, April, June, and November.
 - b) 47 tons for the months of January, March, May, July, August, September, October, and December.

Monitoring/Recordkeeping:

1. Special Condition 5: Records shall be kept for five years of the monthly usage of each material containing an organic solvent, and the organic solvent content thereof. Such records shall be open to inspection by representatives of the Missouri Department of Natural Resources during regular business hours.
2. The permittee shall use Attachment D or an equivalent form generated by the permittee to demonstrate compliance.
3. Records may be kept in either written or electronic form.

Reporting:

1. Special Condition 6: The permittee shall, within 60 days after the end of each calendar year, report to the Missouri Department of Natural Resources the following information:
 - a) The total number of beverage cans produced at its plant,
 - b) The total amount of coatings and solvents used at its plant, and
 - c) The total amount of hydrocarbon emissions from its plant.
2. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
3. The permittee shall report any deviations from the emission limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION PW002

10 CSR 10-6.060 Construction Permits Required
Construction Permit 0486-001, Issued January 26, 1986

Operational Limitation:

Special Condition 8: The permittee shall use a paraffin-based lube for the necker lube. Prior to using any solvent-base lube, the permittee shall obtain approval in accordance with 10 CSR 10-6.060 *Construction Permits Required*.

Reporting:

The permittee shall report any deviations from the operational limitation and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION PW003

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

Emission Limitations:

1. The permittee shall emit less than ten tons of each individual Hazardous Air Pollutant (HAP) from the entire installation in any consecutive 12-month period.
2. The permittee shall emit less than 25 tons combined of HAPs from the entire installation in any consecutive 12-month period.

Operational Limitations:

1. The permittee shall control HAP emissions from their coating operations using a catalytic reactor. The catalytic reactor shall be operated at all times coating operations are being performed.
2. The permittee shall properly operate and maintain the catalytic reactor according to manufacturer's specifications.
3. The permittee shall install temperature monitoring devices on the catalytic reactor before and after the catalyst bed if temperature monitoring devices have not already installed.
4. The temperature of the gas exiting the catalyst bed shall not exceed 1350°F.
5. The temperature of the gas entering the catalyst bed shall be greater than 650°F.

Monitoring/Recordkeeping:

1. The permittee shall calculate the monthly and rolling 12-month HAP emissions from the entire installation for each individual HAP and for total combined HAP using Attachments E, F, and G or equivalent forms generated by the permittee.
2. The permittee shall retain a complete set of Material Safety Data Sheets (MSDS) for all HAP containing materials at the installation.
3. The permittee shall record the inlet and outlet temperatures of the gases being routed to the catalytic reactor at least once each operating day. If the temperature rise across the catalyst is reduced by greater than ten percent from the previous days record, the permittee shall take appropriate corrective action to ensure the catalyst is properly functioning.
4. The permittee shall maintain a maintenance log for the catalytic reactor noting all inspections, malfunctions, and repairs using Attachment A or an equivalent form generated by the permittee.
5. Records may be kept in either written or electronic form.

6. All records shall be kept for no less than five years and be made available immediately to Missouri Department of Natural Resources' personnel upon request.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the end of the month during which records indicate an exceedance of either of the HAP emission limitation.
2. The permittee shall report any deviations from the emission limitations, operational limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

PERMIT CONDITION 001				
Emission Units: B001, B002, B003, B004, and B006				
10 CSR 10-5.030 Maximum Allowable Emissions of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating				
Emission Unit	Description	Fuel	Heat Input (MMBtu/hr)	Installation Date
B001	(9) Make-Up Air Units	Natural Gas	40.9	1979
B002	Fire Water Heater	Natural Gas	1.75	1979
B003	(3) Boilers	Natural Gas	18.9	1979
B004	Water Heater	Natural Gas	2.6	1979
B006	(21) Space Heaters	Natural Gas	2.5	1979

Emission Limitation:

The permittee shall not emit particulate matter in excess of 0.23 lb/MMBtu of heat input.

Operational Limitation:

The permittee shall calibrate, maintain and operate the emission units according to the manufacturer's specifications and recommendations.

Monitoring/Recordkeeping:

1. Maintain a maintenance log noting all inspections, malfunctions, and repairs using Attachment A or an equivalent form generated by the permittee.
2. Records may be kept in either written or electronic form.
3. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
4. All records shall be maintained for five years.
5. Attachment B contains calculations which demonstrate that these emission units will never exceed the emission limitation while burning the specified fuel and being properly maintained and operated.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitation, operational limitation, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 002	
Inside Spray Machines and Bake Ovens	
10 CSR 10-5.330 Control of Emissions From Industrial Surface Coating Operations	
Emission Unit	Description
P006	Line 1 Inside Spray Machine and Bake Oven
	Line 2 Inside Spray Machine and Bake Oven
	Line 3 Inside Spray Machine and Bake Oven
	Line 4 Inside Spray Machine and Bake Oven

Emission Limitation:

The permittee shall not emit volatile organic compounds (VOCs) in excess of 4.2 pounds per gallon of coating (minus water and non-VOC organic compounds) from can interior body spray coating operations.

Compliance Options:

1. The permittee shall adhere with one of the following compliance options:
 - a) The permittee shall only use coatings containing 4.2 pounds VOC per gallon of coating (minus water and non-VOC organic compounds) or less. The permittee shall retain Material Safety Data Sheets (MSDS) on each coating to demonstrate compliance.
 - b) The permittee shall emit less than or equal to 4.2 pounds VOC per gallon of coating (minus water and non-VOC organic compounds based upon a daily volume-weighted average. The daily volume-weighted average (DAVG_{vw}) of all coatings shall be calculated by the following formula:

$$DAVG_{vw} = \frac{\sum_{i=1}^n (A_i \times B_i)}{C}$$

Where:

A = daily usage of each coating in gallons (minus water and exempt solvents);

B = pounds of VOC per gallon of coating (minus water and exempt solvents);

C = total daily usage of all coatings in gallons (minus water and exempt solvents); and

n = the number of different coatings used.

The permittee shall retain MSDS for each coating, their DAVG_{vw}, and all supporting calculations.

Recordkeeping:

1. The permittee shall retain the following records:
 - a) Daily records of the type and the quantity of coatings used;
 - b) MSDS or the coating manufacturer's formulation data for each coating;
 - c) Daily records of the type and quantity of solvents for coating, thinning, purging and equipment cleaning used;
 - d) Any performance test results used to determine capture efficiency, control efficiency, transfer efficiency, or coating makeup;
 - e) Daily records of the type and quantity of waste solvents reclaimed or discarded; and
 - f) Daily records of the quantity of cans coated.
2. Records may be kept in either written or electronic form.

3. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
4. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after records indicate an exceedance of the emission limit.
2. The permittee shall report any deviations from the emission limitation, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 003	
Basecoaters and Varnishers	
10 CSR 10-5.330 Control of Emissions From Industrial Surface Coating Operations	
Emission Unit	Description
P004	(3) Basecoaters and (3) Basecoater Ovens
P006	Line 1 Varnisher
	Line 2 Varnisher
	Line 3 Varnisher
	Line 4 (2) Varnishers

Emission Limitation:

The permittee shall not emit volatile organic compounds (VOCs) in excess of 2.8 pounds per gallon of coating (minus water and non-VOC organic compounds) from can exterior sheet basecoating operations.

Compliance Options:

1. The permittee shall adhere with one of the following compliance options:
 - a) The permittee shall only use coatings containing 2.8 pounds VOC per gallon of coating (minus water and non-VOC organic compounds) or less. The permittee shall retain Material Safety Data Sheets (MSDS) on each coating to demonstrate compliance.
 - b) The permittee shall emit less than or equal to 2.8 pounds VOC per gallon of coating (minus water and non-VOC organic compounds based upon a daily volume-weighted average. The daily volume-weighted average (DAVG_{vw}) of all coatings shall be calculated by the following formula:

$$DAVG_{vw} = \frac{\sum_{i=1}^n (A_i \times B_i)}{C}$$

Where:

- A = daily usage of each coating in gallons (minus water and exempt solvents);
- B = pounds of VOC per gallon of coating (minus water and exempt solvents);
- C = total daily usage of all coatings in gallons (minus water and exempt solvents); and
- n = the number of different coatings used.

The permittee shall retain MSDS for each coating, their DAVG_{vw}, and all supporting calculations.

Recordkeeping:

1. The permittee shall retain the following records:
 - a) Daily records of the type and the quantity of coatings used;
 - b) MSDS or the coating manufacturer’s formulation data for each coating;
 - c) Daily records of the type and quantity of solvents for coating, thinning, purging and equipment cleaning used;
 - d) Any performance test results used to determine capture efficiency, control efficiency, transfer efficiency, or coating makeup;
 - e) Daily records of the type and quantity of waste solvents reclaimed or discarded; and
 - f) Daily records of the quantity of cans coated.
2. Records may be kept in either written or electronic form.
3. These records shall be made available immediately for inspection to Department of Natural Resources’ personnel upon request.
4. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after records indicate an exceedance of the emission limit.
2. The permittee shall report any deviations from the emission limitation, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 004		
Printers		
10 CSR 10-5.340 Control of Emissions From Rotogravure and Flexographic Printing Facilities		
Emission Unit	Description	Control Device
P005	Line 1 Printer	CD06 Catalytic Reactor
	Line 2 Printer	
	Line 3 Printer	
	Line 4 (2) Printers	

Operational Limitations:

1. The permittee shall operate a catalytic reactor to control VOC emissions from each flexographic printer. The catalytic reactor shall remove, destroy, or prevent at least 60 percent of VOC emissions into the ambient air, indicated by weight of the uncontrolled VOC emissions on a daily weighted basis.
2. Low solvent technology may be used to achieve VOC emission reductions instead of a catalytic reactor. If low solvent technology is used, the following limits shall be met for each press:
 - a) For waterborne inks, the volatile portion of the ink as applied to the substrate shall contain no more than 25 percent by volume of VOC; and
 - b) For water-based or high solids inks, the ink as applied to the substrate shall be at least 60 percent by volume non-VOC material.
3. The permittee shall not use or permit the use of any flexographic printing press that uses cleanup solvents containing VOCs unless—
 - a) The cleanup solvents are kept in tightly covered tanks or containers during transport and storage;

- b) The cleaning cloths used with the cleanup solvents are placed in tightly closed containers when not in use and while awaiting off-site transportation. The cleaning cloths shall be properly cleaned and disposed of. The cloths, when properly cleaned or disposed of, shall be processed in a way that as much of the solvent as practicable is recovered for some further use or destroyed. Cleaning and disposal methods shall be approved by the Director; and
- c) The permittee may use an alternate method for reducing cleanup solvent VOC emissions, including the use of low VOC cleanup solvents, if the permittee demonstrates that the emission reduction is equal to or greater than the two previous requirements. This alternate method shall be approved by the Director.

Performance Testing:

The permittee shall perform testing following the procedures contained in 10 CSR 10-6.030(14)(A) and 10 CSR 10-6.030(20) to verify the efficiency of the catalytic reactor. The averaging time for these tests shall be three one-hour tests. These procedures shall determine control device capture efficiency and destruction efficiency. Inlet and outlet gas temperature rise across the catalytic reactor shall be used to determine daily compliance. The temperature monitoring device shall be accurate to within ± 0.75 percent.

Monitoring/Recordkeeping:

1. The following parameters shall be monitored and recorded if a control device is used to achieve compliance:
 - a) Temperature rise across the catalytic reactor on a continuous basis;
 - b) Results of all performance testing conducted on the catalytic reactor;
 - c) Maintenance, repairs and malfunction of any air pollution control equipment when performed (see Attachment A).
2. The following shall be recorded for each flexographic printing press if low solvent technology is used to achieve compliance:
 - a) Volume-weighted ink VOC content in percent by volume for each ink formulation as applied on a monthly basis; and
 - b) Ink usage in gallons for each ink formulation as applied on a daily basis for each press;
 - c) Volume-weighted density of VOCs in ink in lbs/gallon for each ink formulation as applied on a daily basis;
 - d) Volume-weighted average of the VOC content of each ink formulation as applied in percent by volume for each press on a daily basis;
 - e) Ink water content in percent by volume for each ink formulation as applied on a daily basis for each press; and
 - f) Ink exempt solvent content in percent by volume for each ink formulation as applied on a daily basis for each press.
3. The permittee shall retain MSDS or the manufacturer's formulation data for each ink used.
4. Records may be kept in either written or electronic form.
5. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
6. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the operational limitations, performance testing, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 005 Respray Inside Spray Machine 10 CSR 10-5.330 Control of Emissions From Industrial Surface Coating Operations and 10 CSR 10-6.060 Construction Permits Required Construction Permit 0589-001A, Issued April 25, 2003	
Emission Unit	Description
P006	Respray Inside Spray Machine

Emission Limitation:

Special Condition 3: The permittee shall only use coatings in the respray process that comply with the 10 CSR 10-5.330 regulatory limit of 4.2 lb VOC/gallon coating minus water.

Operational Limitation:

Special Condition 5: The permittee shall not use this respray inside spray machine for normal initial inside spraying.

Recordkeeping:

1. Special Condition 4: The permittee shall maintain monthly records on-site, covering a period to include the previous running 60 month period, which show:
 - a) The can production rate for each month and the cumulative total for the previous 12 consecutive months from the respray operation;
 - b) The name and quantities, in gallons per month, of each respray coating used;
 - c) The VOC content, in lb VOC/gallon coating minus water, of each respray coating used;
 - d) The density, in lb/gallon, of each respray coating used;
 - e) The VOC fraction, by weight, of each respray coating used;
 - f) The total VOC emissions for the month and the cumulative total for the previous 12 running months from the respray operation based on the above data.
 - g) Each sheet of the above records shall include the following statement at the end of the sheet: "I (we) have entered the numbers on this record, and do hereby attest by my (our) signature(s) below that this record contains the actual correct and accurate information it portrays." This statement shall then be signed by all personnel involved with recording the numbers. These records shall be accessible to Missouri Air Pollution Control Program enforcement personnel. The above records will allow field inspection to verify compliance with the limit contained within Special Condition 3.
2. The permittee shall retain the following records:
 - a) Daily records of the type and the quantity of coatings used;
 - b) MSDS or the coating manufacturer's formulation data for each coating;

- c) Daily records of the type and quantity of solvents for coating, thinning, purging and equipment cleaning used;
 - d) Any performance test results used to determine capture efficiency, control efficiency, transfer efficiency, or coating makeup;
 - e) Daily records of the type and quantity of waste solvents reclaimed or discarded; and
 - f) Daily records of the quantity of cans coated.
3. Records may be kept in either written or electronic form.
 4. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
 5. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after records indicate an exceedance of the emission limit.
2. The permittee shall report any deviations from the emission limitation, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 006 Line 3 Inside Spray Machine 10 CSR 10-6.060 Construction Permits Required Construction Permit 0589-001A, Issued April 25, 2003	
Emission Unit	Description
P006	Line 3 Inside Spray Machine

Emission Limitation:

Special Condition 6: The permittee shall not emit volatile organic compounds in excess of 28.24 tons in any running 12-month period as a result of evaporative loss from the coatings used in the new inside spray operation on line #3.

Recordkeeping:

1. Special Condition 7: The permittee shall maintain monthly records on-site, covering a period to include the previous running 60 month period, which show:
 - a) The name and quantities, in gallons per month, of each inside spray coating used;
 - b) The density, in lb/gallon, of each inside spray coating used;
 - c) The VOC fraction, by weight, of each inside spray coating used;
 - d) The VOC capture efficiency for the inside spray operation;
 - e) The destruction efficiency of the thermal oxidizer for the inside spray operations;
 - f) The total VOC emissions for the month and the cumulative total for the previous 12 running months from the inside spray operation based on the above data (see Attachment H or an equivalent form generated by the permittee).
 - g) Each sheet of the above records shall include the following statement at the end of the sheet: "I (we) have entered the numbers on this record, and do hereby attest by my (our) signature(s) below that this record contains the actual correct and accurate information it portrays." This statement shall then be signed by all personnel involved with recording the numbers. These records shall be accessible to Missouri Air Pollution Control Program enforcement personnel.

The above records will allow field inspection to verify compliance with the limit contained within Special Condition 6.

2. The permittee shall retain MSDS or the coating manufacturer's formulation data for each coating used within Line 3 Inside Spray Machine.
3. Records may be kept in either written or electronic form.
4. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
5. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after records indicate an exceedance of the emission limit.
2. The permittee shall report any deviations from the emission limitation, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 007	
Line 3 and Respray Inside Spray Machine	
10 CSR 10-6.060 Construction Permits Required	
Construction Permit 0589-001A, Issued April 25, 2003	
Emission Unit	Description
P006	Line 3 Inside Spray Machine
	Respray Inside Spray Machine

Emission Limitation:

Special Condition 9: These sources shall emit less than 40 tons of Volatile Organic Compounds (VOCs) in any consecutive 12-month period.

Monitoring/Recordkeeping:

1. The permittee shall retain Material Safety Data Sheets (MSDS) for each coating used within these spray machines.
2. The permittee shall retain records of the amount of each coating used (lb/month) within these spray machines on a monthly basis.
3. The permittee shall use the monthly usage records and the VOC content from their MSDS to calculate their monthly VOC emissions from these spray machines using Attachment H or an equivalent form generated by the permittee.
4. The permittee shall retain a rolling 12-month total of VOC emissions from these spray machines.
5. Records may be kept in either written or electronic form.
6. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
7. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after records indicate an exceedance of the emission limit.

- The permittee shall report any deviations from the emission limitation, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 008		
Inside Spray Bake Ovens		
10 CSR 10-6.060 Construction Permits Required Construction Permit 0789-003, Issued July 19, 1989		
Emission Unit	Description	Control Device
P006	Line 1 4.2 MMBtu/hr Inside Spray Bake Oven	CD07 Baghouse
	Line 2 4.2 MMBtu/hr Inside Spray Bake Oven	
	Line 3 4.2 MMBtu/hr Inside Spray Bake Oven	
	Line 4 4.2 MMBtu/hr Inside Spray Bake Oven	

Emission Limitation:

Special Condition 2: The permittee shall emit less than 15 tons of PM₁₀ in any consecutive 12-month period from the inside spray bake ovens.

Operational Limitation:

Special Condition 1: The permittee shall employ a baghouse to control particulate emissions whenever the inside spray bake oven is in operation.

Monitoring/Recordkeeping:

- The permittee shall retain Material Safety Data Sheets (MSDS) for each coating baked within the inside spray bake ovens.
- The permittee shall retain records of the quantity of each coating baked (lb/month) within the inside spray bake ovens on a monthly basis.
- The permittee shall retain records of the quantity of natural gas combusted within the inside spray bake ovens.
- The permittee shall use the monthly coating and natural gas usage records, the solids content from their MSDS, and an emission factor of 7.6 lb PM₁₀/MMscf to calculate their monthly PM₁₀ emissions from the inside spray bake ovens using Attachment I or an equivalent form generated by the permittee.
- The permittee shall retain a rolling 12-month total of PM₁₀ emissions from the inside spray bake ovens.
- Records may be kept in either written or electronic form.
- These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
- All records shall be maintained for five years.

Reporting:

- The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after records indicate an exceedance of the emission limit.
- The permittee shall report any deviations from the emission limitation, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 009	
Line 4	
10 CSR 10-6.060 Construction Permits Required Construction Permit 0893-028, Issued July 15, 1993	
Emission Unit	Description
P005	Line 4 (2) Printers
	Line 4 (2) 1.3 MMBtu/hr Printer Ovens
P006	Line 4 (2) Varnishers
	Line 4 Inside Spray Machine
	Line 4 4.2 MMBtu/hr Inside Spray Bake Oven

Emission Limitation:

Special Condition 1: Emissions of Volatile Organic Compounds (VOCs) from Line 4 shall not exceed 68.4 tons in any consecutive 12-month period.

Monitoring/Recordkeeping:

1. The permittee shall retain Material Safety Data Sheets (MSDS) for each coating used on Line 4.
2. The permittee shall retain records of the quantity of each coating used (lb/month) on Line 4 on a monthly basis.
3. The permittee shall use the monthly usage records and the VOC content from their MSDS to calculate their monthly VOC emissions from Line 4 using Attachment J or an equivalent form generated by the permittee.
4. The permittee shall retain a rolling 12-month total of VOC emissions from Line 4.
5. Records may be kept in either written or electronic form.
6. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
7. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after records indicate an exceedance of the emission limit.
2. The permittee shall report any deviations from the emission limitation, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 010		
Basecoaters, Varnishers, Inside Spray Machines, and Ovens		
10 CSR 10-6.070 New Source Performance Regulations		
40 CFR Part 60, Subpart WW – Standards of Performance for the Beverage Can Surface Coating Industry		
Emission Unit	Description	Control Device
P004	(3) Basecoaters	CD06 Catalytic Reactor
	(3) 1.3 MMBtu/hr Basecoater Ovens	
P005	(5) 1.3 MMBtu/hr Printer Ovens	
P006	(5) Varnishers	
	(5) Inside Spray Machines	
	(4) 4.2 MMBtu/hr Inside Spray Bake Ovens	

Emission Limitations:

1. The permittee shall not discharge or cause the discharge of VOC emissions to the atmosphere that exceed the following volume-weighted calendar-month average emissions: [§60.492]
 - a) 0.29 kilogram of VOC per litre of coating solids from each two-piece can exterior base coating operation, except clear base coat; [§60.492(a)]
 - b) 0.46 kilogram of VOC per litre of coating solids from each two-piece can clear base coating operation and from each overvarnish coating operation; and [§60.492(b)]
 - c) 0.89 kilogram of VOC per litre of coating solids from each two-piece can inside spray coating operation. [§60.492(c)]

Demonstrating Compliance:

1. The permittee shall conduct a performance test each calendar month for each coating operation. [§60.493(b)]
 - a) The permittee shall use the following procedures for each affected facility that does not use a capture system and a control device to comply with the emission limit specified under §60.492. The permittee shall determine the VOC-content of the coatings from formulation data supplied by the manufacturer of the coating or by an analysis of each coating, as received, using Method 24. The Administrator may require the permittee to determine the VOC content of coatings using Method 24 or an equivalent or alternative method when using formulation data supplied by the manufacturer of the coating. The permittee shall determine from company records the volume of coating and the mass of VOC-solvent added to coatings. If a common coating distribution system serves more than one affected facility, the permittee shall estimate the volume of coating used at each facility by using the average dry weight of coating, number of cans, and size of cans being processed by each affected facility or by other procedures acceptable to the Administrator. [§60.493(b)(1)]
 - i) Calculate the volume-weighted average of the total mass of VOC per volume of coating solids used during the calendar month for each affected facility, except as provided under Paragraph (b)(1)(iv) of this section. The volume-weighted average of the total mass of VOC per volume of coating solids used each calendar month shall be determined by the following procedures. [§60.493(b)(1)(i)]
 - (1) Calculate the mass of VOC used ($M_o + M_d$) during the calendar month for the affected facility by the following equation:

$$M_o + M_d = \sum_{i=1}^n L_{ci} D_{ci} W_{oi} + \sum_{j=1}^m L_{dj} D_{dj} \quad (1)$$

$\sum L_{dj} D_{dj}$ will be zero if no VOC solvent is added to the coatings, as received.

Where:

n = the number of different coatings used during the calendar month

m = the number of different diluent VOC-solvents used during the calendar month.

[§60.493(b)(1)(i)(A)]

- (2) Calculate the total volume of coating solids used (L_s) in the calendar month for the affected facility by the following equation:

$$L_s = \sum_{i=1}^n L_{ci} V_{si} \quad (2)$$

Where:

n = the number of different coatings used during the calendar month.

[§60.493(b)(1)(i)(B)]

- (3) Calculate the volume-weighted average mass of VOC per volume of solids used (G) during the calendar month for the affected facility by the following equation:

$$G = \frac{M_o + M_d}{L_s} \quad (3) \quad [\text{§60.493(b)(1)(i)(C)}]$$

- ii) Calculate the volume-weighted average of VOC emissions discharged to the atmosphere (N) during the calendar month for the affected facility by the following equation:

$$N = G \quad (4) \quad [\text{§60.493(b)(1)(ii)}]$$

- iii) Where the value of the volume-weighted average mass of VOC per volume of solids discharged to the atmosphere (N) is equal to or less than the applicable emission limit specified under §60.492, the affected facility is in compliance. [§60.493(b)(1)(iii)]

- iv) If each individual coating used by an affected facility has a VOC content equal to or less than the limit specified under §60.492, the affected facility is in compliance provided no VOC-solvents are added to the coating during distribution or application. [§60.493(b)(1)(iv)]

2. Section 60.8(d) does not apply to monthly performance tests and §60.8(f) does not apply to the performance test procedures required by this subpart. [§60.493(a)]

Test Methods/Procedures:

1. The reference methods in Appendix A to this part, except as provided in §60.8, shall be used to conduct performance tests: [§60.496(a)]
- a) Method 24, an equivalent or alternative method approved by the Administrator, or manufacturers' formulation data from which the VOC content of the coatings used for each affected facility can be calculated. In the event of a dispute, Method 24 data shall govern. When VOC content of water-borne coatings, determined from data generated by Method 24, is used to determine compliance of affected facilities, the results of the Method 24 analysis shall be adjusted as described in Section 12.6 of Method 24. [§60.496(a)(1)]
- i) The coating sample shall be a one-litre sample collected in a one-litre container at a point where the sample will be representative of the coating material. [§60.496(b)]
- b) Method 25 or an equivalent or alternative method for the determination of the VOC concentration in the effluent gas entering and leaving the control device for each stack equipped

with an emission control device. The permittee shall notify the Missouri Air Pollution Control Program at least 30 days in advance of any test using Method 25. The following reference methods are to be used in conjunction with Method 25: [§60.496(a)(2)]

- i) Method 1 for sample and velocity traverses [§60.496(a)(2)(i)]
- ii) Method 2 for velocity and volumetric flow rate [§60.496(a)(2)(ii)]
- iii) Method 3 for gas analysis [§60.496(a)(2)(iii)]
- iv) Method 4 for stack gas moisture. [§60.496(a)(2)(iv)]
- v) For Method 25, the sampling time for each of three runs shall be at least one hour. The minimum sample volume shall be 0.003 dscm except that shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Administrator. The Administrator will approve the sampling of representative stacks on a case-by-case basis if the permittee can demonstrate to the satisfaction of the Administrator that the testing of representative stacks would yield results comparable to those that would be obtained by testing all stacks. [§60.496(c)]

Recordkeeping/Reporting:

1. Following the initial performance test, the permittee shall identify, record, and submit quarterly reports to the Administrator of each instance in which the volume-weighted average of the total mass of VOC per volume of coating solids, is greater than the limit specified under §60.492. If no such instances occur during a particular quarter, a report stating this shall be submitted to the Administrator semiannually. [§60.495(b)]
2. The permittee shall maintain at the source, for a period of at least five years, records of all data and calculations used to determine VOC emissions from each affected facility in the initial and monthly performance tests. [§60.495(d)]
3. Records may be kept in either written or electronic form.
4. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
5. All records shall be maintained for five years.
6. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after records indicate an exceedance of the emission limit.
7. The permittee shall report any deviations from the emission limitations, demonstrating compliance, test methods/procedures, monitoring, and recordkeeping/reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 011

Back-Up Fire Pump

10 CSR 10-6.075 Maximum Achievable Control Technology Regulations
40 CFR Part 63, Subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for
Stationary Reciprocating Internal Combustion Engines¹

Emission Unit	Description
E001	310 HP CI Emergency Back-Up Fire Pump

¹An existing emergency stationary CI RICE located at an area source of HAP emissions must comply with the applicable emission limitations and operating limitations no later than May 3, 2013. [§63.6595(a)(1)]

Operational Limitations:

1. At all times the permittee shall operate and maintain the affected engine in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available including review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the engine. [§63.6605(b)]
2. The permittee shall meet the following requirements (except during periods of engine startup): [§63.6603(a)]
 - a) Change the engine oil and oil filter every 500 hours of operation or annually, whichever comes first;
 - b) Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first;
 - c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
3. The Permittee shall only operate the engines within the following hour limitations: [§63.6640(f)]
 - a) Unlimited use in emergency situations. [§63.6640(f)(1)(i)]
 - b) 50 hours per year for any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations. [§63.6640(f)(1)(iii)]
 - c) 100 hours per year for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. The 50 hours allowed above count towards this 100 hour limitation. [§63.6640(f)(1)(ii)]
4. If the engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required above, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under Federal, State, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under Federal, State, or local law has abated. The work practice shall be performed as soon as practicable after the emergency has ended or the unacceptable risk under Federal, State, or local law has abated. The permittee shall report any failure to perform the management practice on the schedule required and the Federal, State, or local law under which the risk was deemed unacceptable [§63.6603(a)]
5. During periods of startup the permittee shall minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [§63.6625(h)]
6. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirements of this condition. The oil analysis shall be performed at every 500 hours of operation or annually. The analysis program shall at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for

these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee shall change the oil before continuing to use the engine. The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program shall be part of the maintenance plan for the engine. [§63.6625(i)]

7. The permittee shall install a non-resettable hour meter on this engine if one is not already installed. [§63.6625(f)]

Recordkeeping:

1. The permittee shall retain the following records for this engine: [§63.6655(a)]
 - a) Records of the occurrence and duration of each malfunction of process equipment or any air pollution control and monitoring equipment and actions taken during periods of malfunction to minimize emissions including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(2) and §63.6655(a)(5)]
 - b) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
 - c) Records that the engine was operated and maintained according to the manufacturer's emission-related operation and maintenance instructions or that a maintenance plan has been developed to provide for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6655(e)]
 - d) Records of the hours of operation for the engine as measured by the non-resettable hour meter. The installation shall also maintain a recordkeeping form indicating out of the total hours measured by the meter: [§63.6655(f)]
 - i) How many hours were spent in emergency use and a brief description of the emergency situation.
 - ii) How many hours were spent in non-emergency operation.
 - e) These records shall be made available for inspection upon request by Missouri Department of Natural Resources' personnel. [§63.6660(a)]
 - f) The permittee shall keep each record readily accessible in hard copy or electronic form for at least five years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660(c)]

Reporting:

The permittee shall report any deviations from the operational limitations, recordkeeping and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit. These reports shall also include the number, duration, and a brief description for each type of malfunction which occurred during the reporting period. The report shall also include a description of actions taken by the permittee during a malfunction of an affected source to minimize emissions, including actions taken to correct a malfunction. If there are no deviations from any operating limitations that apply, a statement that there were no deviations from the operating limitations during the reporting period shall be included. [§63.6650(c)]

PERMIT CONDITION 012	
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants	
Emission Unit	Description
P001	(4) Cuppers
P002	(4) Wet Can Elevators and (28) Bodymakers
P004	(3) Basecoaters and (3) 1.3 MMBtu/hr Basecoater Ovens
P005	(5) Flexographic/Lithographic Printers and (5) 1.3 MMBtu/hr Printer Ovens
P006	(5) Varnishers, (5) Inside Spray Machines, and (4) 4.2 MMBtu/hr Inside Spray Bake Ovens

Emission Limitation:

1. The permittee shall not cause or permit to be discharged into the atmosphere from these emission sources any visible emissions with an opacity greater than 20 percent.
2. Exception: The permittee may discharge into the atmosphere from any source of emissions for a period aggregating not more than six minutes in any 60 minutes air contaminants with an opacity up to 40 percent.

Monitoring:

1. The permittee shall conduct opacity readings on this emission source using the procedures contained in U.S. EPA Test Method 22. Readings are only required when the emission sources are operating and when the weather conditions allow. If no visible emissions are observed using these procedures, then no further observations are required. If visible emissions are observed, then the source representative shall conduct a Method 9 observation.
2. The following monitoring schedule shall be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then
 - b) Observations shall be conducted once every two weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then
 - c) Observations shall be conducted once per month. If a violation is noted, monitoring reverts to weekly.
 - d) If, at the issuance of this permit, the permittee has progressed in the monitoring schedule listed above, the permittee may continue to advance accordingly.
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:

1. The permittee shall maintain records of all Method 22 observation results using Attachment K, or an equivalent form generated by the permittee, noting whether any air emissions (except for water vapor) were visible from the emission source.
2. The permittee shall maintain records of all Method 9 observation results using Attachment L, or an equivalent form generated by the permittee, noting whether the visible emissions (except for water vapor) exceeded the opacity limit.
3. The permittee shall maintain records of any equipment malfunctions using Attachment A or an equivalent form generated by the permittee.
4. Records may be kept in either written or electronic form.

5. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
6. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations, monitoring, recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and annual compliance certification required by Section V of this permit.

PERMIT CONDITION 013	
E001 Back-Up Fire Pump	
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds	
Emission Unit	Description
E001	Back-Up Fire Pump

Emission Limitations:

1. The permittee shall not cause or permit the emission into the atmosphere gases containing more than 500 ppmv of sulfur dioxide or more than 35 mg/m³ of sulfuric acid or sulfur trioxide or any combination of these gases averaged on any consecutive three-hour time period.
2. The permittee shall not cause or permit the emission of sulfur compounds from any source, which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 *Ambient Air Quality Standards*.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO ₂)	0.5 ppm (1300 µg/m ³)	3-hour average not to be exceeded more than once per year
	75 ppb	1-hour average; 3-year average of the 99 th percentile of the daily maximum 1-hour average at each site monitor within an area
Hydrogen Sulfide (H ₂ S)	0.05 ppm (70 µg/m ³)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 µg/m ³)	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H ₂ SO ₄)	10 µg/m ³	24-hour average not to be exceeded more than once in any 90 consecutive days
	30 µg/m ³	1-hour average not to be exceeded more than once in any 2 consecutive days

Monitoring/Recordkeeping:

1. The permittee shall monitor the sulfur content of each delivery of fuel documenting that the sulfur content never exceeds 0.05 percent.
2. These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
3. Records may be kept in either written or electronic form.

4. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 014	
P001 and P002	
10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes	
Emission Unit	Description
P001	(4) Cuppers
P002	(4) Wet Can Elevators and (28) Bodymakers

Emission Limitations:

1. The permittee shall not emit particulate matter in excess of 13.47 lb/hr combined from P001 (4) Cuppers and 13.41 lb/hr combined from P002 (4) Wet Can Elevators and (28) Bodymakers.
2. The permittee shall not cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Monitoring/Recordkeeping:

1. The permittee shall maintain an operating and maintenance log for each emission unit using Attachment A or an equivalent form generated by the permittee. The record shall be maintained in hard copy or electronic form. The log(s) shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc; and
2. The permittee shall retain a copy of the manufacturer's specifications.
3. Attachment M contains calculations documenting that the permittee is in compliance with the particulate matter emission limits without the aid of a control device.
4. Records may be kept in either written or electronic form.
5. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
6. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

PERMIT CONDITION 015		
P004, P005, and P006		
10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes		
Emission Unit	Description	Control Device
P004	(3) Basecoaters	CD05 Cartridge Filter
P005	(5) Printers	
	(5) Varnishers	
P006	(5) Inside Spray Machines	CD07 Baghouse

Emission Limitations:

1. The permittee shall not emit particulate matter in excess of 0.33 lb/hr combined from P004 (3) Basecoaters, 0.23 lb/hr combined from P005 (5) Printers, 0.85 lb/hr combined from P005 (5) Varnishers, and 1.48 lb/hr combined from P006 (5) Interior Spray Machines.
2. The permittee shall not cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Operational Limitations:

1. The permittee shall control particulate emissions from these emission units using the specified control devices. The control device shall be equipped with a gauge or meter, which indicates the pressure drop across the filter medium. The gauge or meter shall be located such that Department of Natural Resources' employees may easily observe them. Replacement filters shall be kept on hand at all times. The filters shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
2. The permittee shall maintain and operate the control devices according to the manufacturer's specifications and recommendations.
3. The control devices shall be operated such that the minimum pressure drop across the control device is greater than or equal to 0.5" of water column.
 - a) Exception: Due to a lack of cake on the filter medium, the permittee is not restricted to a minimum pressure drop across the control device for the first 24 hours after replacement of a filter.

Monitoring/Recordkeeping:

1. The permittee shall monitor and record the operating pressure drop across the control devices at least once each operating day while the unit is operating. The operating pressure drop range shall be specified based on normal operation and manufacturer's recommendations.
2. The permittee shall maintain an operating and maintenance log for each control device using Attachment A or an equivalent form generated by the permittee. The record shall be maintained in hard copy or electronic form. The log(s) shall include the following:
 - a) Incidents of malfunction, with impact on emissions, duration of the event, probable cause of the event, and corrective actions;
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc; and
 - c) Dates and times of all filter replacements.
3. The permittee shall retain a copy of the manufacturer's specifications.
4. Attachment M contains calculations documenting that the permittee is in compliance with the particulate matter emission limits while the specified control devices are being properly maintained and operated.
5. Records may be kept in either written or electronic form.

6. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
7. All records shall be maintained for five years.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this regulation, or any malfunction which could possibly cause an exceedance of this regulation.
2. The permittee shall report any deviations from the emission limitations, monitoring/recordkeeping, and reporting requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 - i) St. Louis metropolitan area: The open burning of household refuse is prohibited;
 - b) Yard waste, with the following exceptions:
 - i) St. Louis metropolitan area: The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed 16 ft². 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 permittee fails to comply with the conditions or any provisions of the permit.
- 4) Metal Container Corporation 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 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 Metal Container Corporation 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 permittee 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 shall 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. The permittee 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 submit a full paper EIQ to the Air Pollution Control Program by no later than April 1st after the end of each reporting year. The permittee may instead submit a full electronic EIQ via MoEIS by no later than May 1st after the end of each reporting year.
- 5) Emission fees are due by no later than June 1st after the end of each reporting year. The fees shall be payable to the Missouri Department of Natural Resources.
- 6) 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 12-month period immediately preceding the end of the reporting period.
- 7) 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:

- 1) 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.
- 2) The permittee shall maintain the following monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight consecutive weeks after permit issuance.
 - b) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once every two weeks for a period of eight 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.

- c) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

- 1) The permittee shall document all readings on Attachment C, or its equivalent, noting the following:
 - a) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
 - b) Whether equipment malfunctions contributed to an exceedance.
 - c) Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

10 CSR 10-5.040 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 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 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 volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

10 CSR 10-5.240 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 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

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

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:

- a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
- a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with 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 Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) October 1st for monitoring which covers the January through June time period, and
 - ii) April 1st for monitoring which covers the July through December time period.
 - iii) Exception. Monitoring requirements which require reporting more frequently than semi annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, 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

The permittee may switch coatings at any time provided that the new coatings still achieve compliance with the VOC lb/gallon emission limitations and their percent solids do not exceed those stated in Attachment M.

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 the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and Part 64 exceedances and excursions must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;

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

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

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

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

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

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

An installation that has been issued a Part 70 operating permit is not required to apply for or obtain a permit revision in order to make any of the changes to the permitted installation described below if the changes are not Title I modifications, the changes do not cause emissions to exceed emissions allowable under the permit, and the changes do not result in the emission of any air contaminant not previously emitted. The permittee shall notify the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, at least seven days in advance of these changes, except as allowed for emergency or upset conditions. Emissions allowable under the permit means a federally enforceable permit term or condition determined at issuance to be required by an applicable requirement that establishes an emissions limit (including a work practice standard) or a federally enforceable emissions cap that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject.

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

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

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

emissions, pollutants emitted and any applicable requirement that would apply as a result of the change.

- c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes; and
- d) The permit shield shall not apply to these changes.

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

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

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

This permit may be reopened for cause if:

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

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

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

VI. Attachments

Attachments follow.

Attachment B
 10 CSR 10-5.030 Compliance Demonstration

This attachment may be used to demonstrate that the listed emission units are in compliance with 10 CSR 10-5.030, *Maximum Allowable Emission of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*. Installation's Total Heat Input (Q) in MMBtu/hr:

Emission Unit	Description	MHDR (MMBtu/hr)
B001	(9) Make-Up Air Units	40.9
B002	Fire Water Heater	1.75
B003	(3) Boilers	18.9
B004	Water Heater	2.6
B006	(21) Space Heaters	2.5
Total Q		66.65

The maximum allowable PM emission rate from new indirect heating source having an intermediate capacity between 10 MMBtu and 1,000 MMBtu:

$$E = 0.80(Q)^{-0.301}$$

$$E = 0.80(66.65)^{-0.301} = 0.23 \text{ lb/MMBtu}$$

Emission Unit	Description	Emission Factor (lb/MMscf)	Emission Factor (lb/MMBtu)	Emission Limit (lb/MMBtu)	Is the Emission unit in compliance?
B001	(9) Make-Up Air Units	8.7	0.008	0.23	YES
B006	(21) Space Heaters				
B002	Fire Water Heater	7.6	0.007		
B003	(3) Boilers				
B004	Water Heater				

The emission factor for B001 and B006 was taken from FIRE for Process SCC 10500106. The emission factor for B002, B003, and B004 was taken from FIRE for Process SCC 10200603. An average heating value of 1,050 MMBtu/MMscf of natural gas, obtained from AP-42's Appendix A, was employed in the conversion of each emission factor. These emission units meet the emission limitation without the aid of a control device; therefore, 40 CFR Part 64 *Compliance Assurance Monitoring* is not applicable.

Attachment D
 Construction Permit 0279-001 VOC Emissions

Emission Unit	Description	Chemical Stored/Used (Name and CAS No.)¹	Monthly Usage (1000 gallons)	Emission Factor^{2,3,4} (lb/1000 gallons)	VOC Emissions (lb/month)	
T001	(4) 10,000 gallon Tanks					
T002						
T003						
T004						
T008	(3) 3,000 gallon Tanks					
Diesel Tanks	1,000 gallon Tank					
	900 gallon Tank					
T002A	(6) 500 gallon Tanks					
T003A						
T004A						
			(gallons)	(lb/gallon)	(lb/month)	
P004	Basecoating					
P005	Printing					
P006	Varnishing					
	Inside Spray					
F001	Clean-Up Solvent					
			(1000 gallons)	(lb/1000 gallons)	(lb/month)	
E001	Diesel Combustion			49.3		
			(MMscf)	(lb/MMscf)	(lb/month)	
B001 – B006 and P003 – P006	Natural Gas Combustion			5.5		
VOC Emissions (lb/month):						

¹The permittee shall document the chemical stored/used during the reporting period.

²Tank emission factors shall be obtained from EPA's TANKS 4.0 for the chemical stored/used.

³P004, P005, P006, and F001 emission factors shall be calculated based upon the density and VOC wt% obtained from MSDS as follows: Uncontrolled Emission Factor = Density (lb/gallon) x VOC wt%.

⁴The permittee may include a capture efficiency of 80% to the basecoating and inside spray emission factors. The permittee may include a capture efficiency of 50% to the printing and varnishing emission factors. The permittee may include a destruction efficiency of 90% to the basecoating, printing, varnishing, and inside spray emission factors. The controlled emission factor shall be calculated

as follows:
$$\text{Controlled Emission Factor} = \text{Uncontrolled Emission Factor} \times \left(1 - \frac{\% \text{ Captured}}{100}\right) \times \left(1 - \frac{\% \text{ Destroyed}}{100}\right)$$

Attachment E
Plantwide Combined HAP Emissions

Emission Unit	Description	Chemical Stored/Used (Name and CAS No.)¹	Monthly Usage (1000 gallons)	Emission Factor^{2,3,4} (lb/1000 gallons)	HAP Emissions (lb/month)	
T001	(4) 10,000 gallon Tanks					
T002						
T003						
T004						
T008	(3) 3,000 gallon Tanks					
Diesel Tanks	1,000 gallon Tank					
	900 gallon Tank					
T002A	(6) 500 gallon Tanks					
T003A						
T004A						
			(gallons)	(lb/gallon)	(lb/month)	
P004	Basecoating					
P005	Printing					
P006	Varnishing					
	Inside Spray					
F001	Clean-Up Solvent					
			(1000 gallons)	(lb/1000 gallons)	(lb/month)	
E001	Diesel Combustion			0.52518		
			(MMscf)	(lb/MMscf)	(lb/month)	
B001 – B006 and P003 – P006	Natural Gas Combustion			1.9		
HAP Emissions (lb/month):						

¹The permittee shall document the chemical stored/used during the reporting period.

²Tank emission factors shall be obtained from EPA's TANKS 4.0 for the chemical stored/used.

³P004, P005, P006, and F001 emission factors shall be calculated based upon the density and Combined HAP wt% obtained from MSDS as follows: Uncontrolled Emission Factor = Density (lb/gallon) x Combined HAP wt%

⁴The permittee may include a capture efficiency of 80% to the basecoating and inside spray emission factors. The permittee may include a capture efficiency of 50% to the printing and varnishing emission factors. The permittee may include a destruction efficiency of 90% to the basecoating, printing, varnishing, and inside spray emission factors. The controlled emission factor shall be calculated

as follows:
$$\text{Controlled Emission Factor} = \text{Uncontrolled Emission Factor} \times \left(1 - \frac{\% \text{ Captured}}{100}\right) \times \left(1 - \frac{\% \text{ Destroyed}}{100}\right)$$

Attachment F
 Plantwide Combined Glycol Ether Emissions

Emission Unit	Description	Chemical Stored/Used (Name and CAS No.)¹	Monthly Usage (1000 gallons)	Emission Factor^{2,3,4} (lb/1000 gallons)	Glycol Ether Emissions (lb/month)
T001	(4) 10,000 gallon Tanks				
T002					
T003					
T004					
T008	(3) 3,000 gallon Tanks				
T002A	(6) 500 gallon Tanks				
T003A					
T004A					
			(gallons)	(lb/gallon)	(lb/month)
P004	Basecoating				
P005	Printing				
P006	Varnishing				
	Inside Spray				
F001	Clean-Up Solvent				
Glycol Ether Emissions (lb/month):					

¹The permittee shall document the chemical stored/used during the reporting period.

²Tank emission factors shall be obtained from EPA's TANKS 4.0 for the chemical stored/used.

³P004, P005, P006, and F001 emission factors shall be calculated based upon the density and Glycol Ether wt% obtained from MSDS as follows: Uncontrolled Emission Factor = Density (lb/gallon) x Glycol Ether wt%

⁴The permittee may include a capture efficiency of 80% to the basecoating and inside spray emission factors. The permittee may include a capture efficiency of 50% to the printing and varnishing emission factors. The permittee may include a destruction efficiency of 90% to the basecoating, printing, varnishing, and inside spray emission factors. The controlled emission factor shall be calculated

as follows:
$$\text{Controlled Emission Factor} = \text{Uncontrolled Emission Factor} \times \left(1 - \frac{\% \text{ Captured}}{100}\right) \times \left(1 - \frac{\% \text{ Destroyed}}{100}\right)$$

Attachment G
 Plantwide Individual HAP Emissions

HAP Name:
 CAS Number:

Emission Unit	Description	Chemical Stored/Used (Name and CAS No.) ¹	Monthly Usage (1000 gallons)	Emission Factor ^{2,3,4} (lb/1000 gallons)	HAP Emissions (lb/month)	
T001	(4) 10,000 gallon Tanks					
T002						
T003						
T004						
T008	(3) 3,000 gallon Tanks					
Diesel Tanks	1,000 gallon Tank					
	900 gallon Tank					
T002A	(6) 500 gallon Tanks					
T003A						
T004A						
			(gallons)	(lb/gallon)	(lb/month)	
P004	Basecoating					
P005	Printing					
P006	Varnishing					
	Inside Spray					
F001	Clean-Up Solvent					
			(1000 gallons)	(lb/1000 gallons)	(lb/month)	
E001	Diesel Combustion					
			(MMscf)	(lb/MMscf)	(lb/month)	
B001 – B006 and P003 – P006	Natural Gas Combustion					
HAP Emissions (lbs/month):						

¹The permittee shall document the chemical stored/used during the reporting period.

²Tank emission factors shall be obtained from EPA's TANKS 4.0 for the chemical stored/used.

³P004, P005, P006, and F001 emission factors shall be calculated based upon the density and Combined HAP wt% obtained from MSDS as follows: Uncontrolled Emission Factor = Density (lb/gallon) x Combined HAP wt%

⁴The permittee may include a capture efficiency of 80% to the basecoating and inside spray emission factors. The permittee may include a capture efficiency of 50% to the printing and varnishing emission factors. The permittee may include a destruction efficiency of 90% to the basecoating, printing, varnishing, and inside spray emission factors. The controlled emission factor shall be calculated

as follows:
$$\text{Controlled Emission Factor} = \text{Uncontrolled Emission Factor} \times \left(1 - \frac{\% \text{ Captured}}{100}\right) \times \left(1 - \frac{\% \text{ Destroyed}}{100}\right)$$

ATTACHMENT M
 10 CSR 10-6.400 Compliance Demonstration

This attachment may be used to demonstrate that the listed emission units are in compliance with 10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes*.

Allowable PM emission limitation for sources having a process weight rate (P) of 30 ton/hr or less:
 $E = 4.1(P)^{0.67}$

Potential PM Emission Rate = P (ton/hr) x PM Emission Factor (lb/ton)

Potential PM Concentration = $\frac{\text{Potential PM Emission Rate (lb/hr)} \times 7000 \text{ (gr/lb)}}{\text{Stack Flowrate (scf/min)} \times 60 \text{ (min/hr)}}$

Uncontrolled Calculations

Emission Unit(s)	P (ton/hr)	PM Emission Factor (lb/ton)	Potential PM Emission Rate (lb/hr)	PM Emission Rate Limit (lb/hr)	Potential PM Conc. (gr/scf)	PM Conc. Limit (gr/scf)	Potential PM Emissions (ton/yr)	Potential PM Emissions (tons/yr) per emission unit
P001 (4) Cuppers	5.9	1.0	5.9	13.47	0.05	0.3	25.84	6.46
P002 (4) Wet Elevators and (28) Bodymakers	5.9	1.16	6.82	13.41	0.03		29.87	0.93
P004 (3) Basecoaters	0.02	678	16.04	0.33	0.05		70.24	23.41
P005 (5) Printers	0.01	1051.1	14.67	0.23	0.83		64.27	12.85
P005 (5) Varnishers	0.1	636	60.35	0.85			264.35	52.87
P006 (5) Interior Spray Machines	0.22	248.4	54.4	1.48	0.20		238.27	47.65

The particulate emission factor for P001 was taken from OP2006-041. The cuppers have a combined stack flowrate of 14,748 scf/min. The cuppers are in compliance with both limits without the aid of control device; therefore, 40 CFR Part 64 *Compliance Assurance Monitoring* is not applicable.

The particulate emission factor for P002 is based upon stack testing results. P002 has a combined stack flowrate of 30,810 scf/min. P002 is in compliance with both limits without the aid of control device; therefore, 40 CFR Part 64 *Compliance Assurance Monitoring* is not applicable. Stack testing results were as follows:

Description	Oil Emission Rate (lb/hr)	Oil Solids Emission Rate (lb/hr) ¹	Emission Factor (lb/ton) ²
(3) Wet Can Elevators Lines 1 - 3	45.8	2.29	0.39
Wet Can Elevator Line 4	45.8	2.29	0.39
Bodymakers Lines 1 - 3	33.6	1.68	0.28
Bodymakers Line 4	11.2	0.56	0.10
P002 Total	136.4	6.82	1.16

¹The water content of the lubricant is 95% (i.e. 5% solids).

²The Oil Solids Emission Rate (lbs/hr) was divided by the maximum hourly design rate of 5.9 tons/hr to obtain the emission factor in lbs/ton.

ATTACHMENT M Continued
 10 CSR 10-6.400 Compliance Demonstration

The particulate emission factor for P004 is for the worst-case basecoat paint with 56.5 percent solids and a 40 percent transfer efficiency. The combined stack flowrate for all of the basecoaters is 38,056 scf/min. The basecoaters do not meet the particulate emission rate limit uncontrolled. Potential uncontrolled annual emissions for each basecoater are below the major source threshold of 100 ton/yr; therefore, 40 CFR Part 64 *Compliance Assurance Monitoring* is not applicable.

The particulate emission factor for P005 Printers is for the worst-case ink with 87.59 percent solids and a 40 percent transfer efficiency. The particulate emission factor for P005 Varnishers is for the worst-case varnish with 53 percent solids and a 40 percent transfer efficiency. The combined P005 stack flowrate is 10,527 scf/min. P005 operations do not meet the particulate emission limits uncontrolled. Potential uncontrolled annual emissions for each emission unit reported under P005 are below the major source threshold of 100 ton/yr; therefore, 40 CFR Part 64 *Compliance Assurance Monitoring* is not applicable.

The particulate emission factor for P006 Interior Spray Machines is for the worst-case interior spray with 20.7 percent solids and a 40 percent transfer efficiency. The combined P006 stack flowrate is 31,597 scf/min. P006 operations do not meet the particulate emission limits uncontrolled. Potential uncontrolled annual emissions for each emission unit reported under P006 are below the major source threshold of 100 ton/yr; therefore, 40 CFR Part 64 *Compliance Assurance Monitoring* is not applicable.

Controlled Calculations

Emission Unit	Control Device Efficiency	Potential PM Emission Rate (lb/hr)	PM Emission Limit (lb/hr)	Potential PM Conc. (gr/scf)	PM Conc. Limit (gr/scf)
P004 (3) Basecoaters	97.9	0.33	0.33	0.001	0.3
P005 (5) Printers	98.4	0.23	0.23	0.01	
P005 (5) Varnishers	98.6	0.85	0.85		
P006 (5) Interior Spray Machines	97.3	1.48	1.48	0.005	

P004 Basecoaters, P005 Printers, and P005 Varnishers were given 97.9 percent, 98.4 percent, and 98.6 percent control efficiencies, respectively, for cartridge filters. The permittee is in compliance with the PM emission rate limits while the cartridge filters are being properly maintained and operated.

P006 Interior Spray Machines were given a 97.3 percent control efficiency for a baghouse. The permittee is in compliance with the PM limits while the baghouse is being properly maintained and operated.

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 January 11, 2011
- 2) 2010 Emissions Inventory Questionnaire
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition
- 4) U.S. EPA's Factor Information Retrieval (FIRE) Date System 6.25
- 5) Construction Permit 0279-001, Issued February 1, 1979
- 6) Construction Permit 0486-001, Issued January 26, 1986
- 7) Construction Permit 0287-001, Issued February 2, 1987
- 8) Construction Permit 0589-001, Issued May 5, 1989
- 9) Construction Permit 0589-001A, Issued November 7, 1989
- 10) Clarification of Construction Permit 0589-001A, Issued April 25, 2003
- 11) Construction Permit 0789-003, Issued July 19, 1989
- 12) Construction Permit 1291-001, Issued December 3, 1991
- 13) Construction Permit 0893-028, Issued July 15, 1993
- 14) Construction Permit 0494-010, Issued March 31, 1994
- 15) Construction Permit 0495-018, Issued April 11, 1995
- 16) Temporary Construction Permit No. 099-0044-025, Issued September 30, 1997:

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 10-5.300 *Control of Emissions From Solvent Metal Cleaning* is not applicable to the installation and has not been applied within this permit. The installation does participate in solvent metal cleaning using nonaqueous solvents to clean and remove soils from metal parts; however, none of the installation's cleaning operations consist of spray gun cleaners, cold cleaners with a solvent reservoir, open-top or conveyORIZED vapor degreasers, or air-tight or airless cleaning systems. [10 CSR 10-5.300(1)(C)]

10 CSR 10-5.442 *Control of Emissions from Lithographic Printing Operations* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to offset lithographic printing presses in City of St. Louis and Jefferson, St. Charles, Franklin and St. Louis Counties. [10 CSR 10-5.442(2)(A)] 10 CSR 10-5.442(2)(C) exempts installations that print on metal.

10 CSR 10-5.455 *Control of Emission from Solvent Cleanup Operations* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to sources emitting 500 lb/day or more of cleaning solvent VOCs. [10 CSR 10-5.455(2)(B)] Potential cleaning solvent VOC emissions from the installation are estimated to be 96 lb/day.

10 CSR 10-5.500 *Control of Emission From Volatile Organic Liquid Storage* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to 40,000 gallon capacity or greater volatile organic liquid storage containers. [10 CSR 10-5.500(1)(B)] The installation's largest tanks are only 10,000 gallons in capacity.

10 CSR 10-5.570 *Control of Sulfur Emissions From Stationary Boilers* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to industrial boilers and process heaters having a nameplate capacity greater than 50 MMBtu/hr. [10 CSR 10-5.570(1)(A)] The installation's largest boilers/process heaters are only 6.3 MMBtu/hr.

Construction Permits

Construction Permit 0279-001, Issued February 1, 1979:

- ◆ This PSD permit is for the installation of three can production lines consisting of a natural gas fired exterior basecoat drying oven, a natural gas fired ink drying oven, a natural gas fired inside and end coating drying oven, a natural gas fired inside respray drying oven, three wax necker lubricant application processes, three natural gas fired can washer drying ovens, a 0.5 MMBtu/hr natural gas fired hot water heater, three 1.667 MMBtu/hr natural gas fired make up air units, a 1.67 MMBtu/hr natural gas fired fire water heater, nine natural gas fired space heaters with a total heat input of 6.1 MMBtu/hr, and cleaning solvent usage.
- ◆ Special Conditions 1 and 3 contained hydrocarbon emission offset provisions. Hydrocarbon emission offsets have already been established and approved; therefore, these special conditions are no longer applicable.
- ◆ Special Conditions 2, 4, 5, and 6 have been applied within this permit (see Permit Condition PW001).

Construction Permit 0486-001, Issued January 26, 1986:

- ◆ This PSD permit is for the addition of a fourth beverage can production line at the installation. The production line can produce 1.5 billion beer cans and 600 million soft drink cans annually. The beverage line is subject to NSPS WW.
- ◆ Special Conditions 1, 2, and 3 require the installation to comply with 40 CFR Part 60, Subpart WW Standards of Performance for the Beverage Can Surface Coating Industry. 40 CFR Part 60, Subpart WW requirements can be found within Permit Condition 010.
- ◆ Special Conditions 4, 5, 6, and 7 contain performance testing requirements. This performance testing has already been conducted, the permittee should refer to these special conditions should the Missouri Air Pollution Control Program request new performance tests be conducted.
- ◆ Special Condition 8 has been applied within this permit (see Permit Condition PW002).
- ◆ Special Condition 9 contains hydrocarbon emission offset provisions. Hydrocarbon emission offsets have already been established and approved; therefore, this special condition is no longer applicable.

Construction Permit 0287-001, Issued February 2, 1987:

- ◆ This PSD permit is for the addition of a fifth beverage can production line at the installation. The production line can produce 1400 cans per minute, 84,000 cans per hour, and 735.84 million cans per year. The beverage line is subject to NSPS WW.

- ◆ This production line was never constructed. The effective period of this construction period has passed; therefore, the installation must obtain a new construction permit prior to the installation of a fifth production line.

Construction Permit 0589-001, Issued May 5, 1989:

Construction Permit 0589-001A, Issued November 7, 1989:

Clarification of Construction Permit 0589-001A, Issued April 25, 2003:

- ◆ This de minimis construction permit is for the replacement of an inside spray machine on beverage can line #3, the replaced inside spray machine will instead be used respray machine on the line #3. The new machine has a maximum production rate of 1250 cans/minute, while the respray machine has a maximum production rate of 350 cans/min. 80 percent of VOC emissions from the inside spray machine are routed to the catalytic reactor. VOC emissions from the respray machine are not captured.
- ◆ Special Conditions 1 and 2 were nullified April 25, 2003.
- ◆ Special Conditions 3, 4, 5 have been applied within this permit (see Permit Condition 005).
- ◆ Special Conditions 6, 7 have been applied within this permit (see Permit Condition 006).
- ◆ Special Condition 8 requires Line 3 Inside Spray Machine to comply with 40 CFR Part 60, Subpart WW Standards of Performance for the Beverage Can Surface Coating Industry. 40 CFR Part 60, Subpart WW requirements can be found within Permit Condition 010.
- ◆ Special Condition 9 has been applied within this permit (see Permit Condition 007).
- ◆ Special Conditions 10 and 11 require notification of anticipated and actual start up. These notifications have already been submitted; therefore, the special conditions have not been included within this permit.

Construction Permit 0789-003, Issued July 19, 1989:

- ◆ This de minimis construction permit is for the installation of cartridge filters on the inside spray ovens. The cartridge filters have an exit air flow rate of 29,800 ft³/minute and provide 99.9 percent particulate control.
- ◆ Special Conditions 1 and 2 have been applied within this permit (see Permit Condition 008).
- ◆ Special Conditions 3 and 4 require notification of anticipated and actual start up. These notifications have already been submitted; therefore, the special conditions have not been included within this permit.

Construction Permit 1291-001, Issued December 3, 1991:

- ◆ This de minimis construction permit is for the installation of 2,080 ft³ lime storage silo. The silo has a maximum hourly design rate of 15 tons per hour and employs a filter collecting 95 percent of particulate emissions.
- ◆ This construction permit does not contain any special conditions.

Construction Permit 0893-028, Issued July 15, 1993:

- ◆ This de minimis construction permit is for the installation of two inside spray machines and one oil mist eliminator to line #4 increasing line #4's maximum production rate to 2,400 cans/minute. The oil mist eliminator controls VOC emissions from the can bodymakers.
- ◆ Special Condition 1 has been applied within this permit (see Permit Condition 009).

- ◆ Special Condition 2 requires the permittee to demonstrate, to the satisfaction of the Director, that the limitation in Special Condition 1 has been met. Monitoring/recordkeeping requirements sufficient to demonstrate compliance have been added to Permit Condition 009.
- ◆ Special Conditions 3 and 4 require Line 4 to comply with 40 CFR Part 60, Subpart WW Standards of Performance for the Beverage Can Surface Coating Industry. 40 CFR Part 60, Subpart WW requirements can be found within Permit Condition 010.
- ◆ Special Conditions 5, 6, and 7 contain performance testing requirements. This performance testing has already been conducted. The permittee should refer to these special conditions should the Missouri Air Pollution Control Program request new performance tests be conducted.

Construction Permit 0494-010, Issued March 31, 1994:

- ◆ This de minimis construction permit is for miscellaneous equipment constructed without a permit after April 11, 1980. The permitted equipment includes a 10,000 gallon bulk varnish storage tank, two 500 gallon varnish day tanks, can washer exhaust, can washer vacuum, an ink cleaner tank, and a 900 gallon diesel storage tank.
- ◆ This construction permit does not contain any special conditions.

Construction Permit 0495-018, Issued April 11, 1995:

- ◆ This de minimis construction permit is for the installation of an ink dot identification system to existing inside spray operations. The ink dots will be used for product quality control purposes.
- ◆ This construction permit does not contain any special conditions.

Temporary Construction Permit 099-0044-025, Issued September 30, 1997:

- ◆ This temporary construction permit is for the installation and testing of a biofiltration control technology.
- ◆ This temporary construction permit expired September 1, 1998.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60, Subparts D, Da, Db, and Dc – *Standards of Performance for Steam Generating Units* are not applicable to the installation and have not been applied within this permit. Subparts D and Da are only applicable to steam generating units with a heat input rate greater than 250 MMBtu/hr. [§60.40(a) and §60.40a(a)] Subpart Db is only applicable to steam generating units with a heat input rate greater than 100 MMBtu/hr. [§60.40b(a)] Subpart Dc is only applicable to steam generating units with a heat input rate greater than 10 MMBtu/hr. [§60.40c(a)] The installation's largest steam generating units, B003 (3) Boilers, are only 6.3 MMBtu/hr each.

40 CFR Part 60, Subparts K, Ka, and Kb – *Standards of Performance for Storage Vessels* are not applicable to the installation and have not been applied within this permit. Subparts K and Ka are only applicable to storage vessels greater than 40,000 gallons in capacity. [§60.110(a) and §60.110a(a)] Subpart Kb is applicable to storage vessels greater than 75 m³ (19,812 gallons) in capacity. [§60.110b(a)] The installation's largest storage tanks - T001 D& I Lube Bulk Tank, T002 Basecoat Bulk Tank, T003 Varnish Bulk Tank, and T004 Inside Spray Bulk Tank – are each only 10,000 gallons in capacity.

40 CFR Part 60, Subpart WW – *Standards of Performance for the Beverage Can Surface Coating Industry* is applicable to the installation and has been applied within this permit (see Permit Condition 010).

40 CFR Part 60, Subpart IIII - *Standards of Performance for Stationary Compression Ignition Internal Combustion Engines* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to owners and operators of stationary CI ICE constructed after July 11, 2005. [§60.4200(a)(2)] E001 Back-Up Fire Pump is the only RICE at the installation and was constructed prior to 2005.

Maximum Achievable Control Technology (MACT) Applicability

The installation has accepted a voluntary condition (see Permit Condition PW003) to become a synthetic minor (area) source of Hazardous Air Pollutants (HAPs).

40 CFR Part 63, Subpart T – *National Emission Standards for Halogenated Solvent Cleaning* is not applicable to the installation and has not been applied within this permit. This regulation applies to individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machines that use any solvent containing methylene chloride (CAS No. 75–09–2), perchloroethylene (CAS No. 127–18–4), trichloroethylene (CAS No. 79–01–6), 1,1,1-trichloroethane (CAS No. 71–55–6), carbon tetrachloride (CAS No. 56–23–5) or chloroform (CAS No. 67–66–3), or any combination of these halogenated HAP solvents, in a total concentration greater than five percent by weight, as a cleaning and/or drying agent. [§63.460(a)] The installation does not operate any solvent cleaning machines as defined within §63.461.

40 CFR Part 63, Subpart KKKK – *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans* is not applicable to the installation and has not been applied within this permit. This regulation applies to surface coating of metal cans and ends at major HAP sources. [§63.3481(a) and (b)] The installation is a synthetic minor (area) source of HAPs (see Permit Condition PW003).

40 CFR Part 63, Subpart ZZZZ – *National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* is applicable to the installation and has been applied within this permit (see Permit Condition 011).

40 CFR Part 63, Subpart HHHHHH – *National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources* is not applicable to the installation and has not been applied within this permit. This regulation is applicable to area sources using methylene chloride (75-09-2) to remove paint and to area sources that spray apply coatings containing Chromium (Cr), Lead (Pb), Manganese (Mn), Nickel (Ni), or Cadmium (Cd). [§63.11169(a) and (c)]

40 CFR Part 63, Subpart JJJJJJ – *National Emission Standards for Hazardous Air Pollutants for Industrial Commercial, and Institutional Boilers Area Sources* is not applicable to the installation and has not been applied within this permit. This regulation applies to coal, biomass, and oil boilers located at area sources. [§63.11194(a)(1)] The boilers at the installation, B003 (3) 6.3 MMBtu/hr Boilers, are all “gas-fired boilers” as defined by §63.11237.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61, Subpart M – *National Emission Standards for Asbestos* is applicable to the installation and has been applied within this permit (see Section IV. Core Permit Requirements).

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.

40 CFR Part 64 is not applicable because none of the pollutant-specific emission units using a control device to achieve compliance with an emission limitation has pre-control emissions in excess of the major source threshold.

Greenhouse Gas Emissions

On May 13, 2010 EPA issued the GHG Tailoring Rule which set the major source threshold for CO₂e to be 100,000 ton/year within 40 CFR Part 70. As of July 1, 2011 all Title V operating permits are required to include GHG emissions. Potential emissions of greenhouse gases (CO₂e) for this installation are calculated to be 77,324.01 tons, classifying the installation as a minor source of GHGs. Please note that the potential emissions of greenhouse gases from this installation are only for stationary sources as §70.2 defines emission unit as “any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant or any pollutant listed under Section 112(b) of the Act.”

Other Regulatory Determinations

The permittee uses their catalytic reactor to control HAP emissions from their coating operations and comply with their voluntary 10/25 HAP limits (see Permit Condition PW003); therefore, the requirement to maintain and operate their catalytic reactor has been added to this permit. The installation’s 2009 EIQ actual glycol ethers (20-10-0) emissions, including catalytic reactor control, was 5.73 tons. If the installation had not operated the catalytic reactor, uncontrolled glycol ether emissions for the 2009 reporting year would have been 20.48 tons.

10 CSR 10-5.330 *Control of Emissions From Industrial Surface Coating Operations* is applicable to the installation and has been applied within this permit (see Permit Conditions 002, 003, and 005). P005 Printers are exempt from this regulation per 10 CSR 10-5.330(1)(D)12 as they are subject to and complying with 10 CSR 10-5.340 (see Permit Condition 004).

10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants* is applicable to the installation and has been applied within this permit (see Permit Condition 012). The regulation is applicable to the following visible emission sources; however, as potential particulate emissions for these sources is less than 0.5 lb/hr they are assumed to be in compliance and have no monitoring/recordkeeping/reporting at this time:

Emission Unit	Description	Particulate Emission Rate (lb/hr)
B001	(9) Make-Up Air Units, 40.9 MMBtu/hr	0.36
B002	1.75 MMBtu/hr Fire Water Heater	0.01
B003	(3) 6.3 MMBtu/hr Boilers	0.14
B004	2.6 MMBtu/hr Water Heater	0.02
B005	13.5 MMBtu/hr Catalytic Oxidizer	0.10
B006	(21) Space Heaters, 2.5 MMBtu/hr	0.02
M001	Grinder	0.02
P003	Can Washer Ovens, 6.6 MMBtu/hr	0.05

10 CSR 10-6.220(1)(A) exempts stationary internal combustion engines operated in the St. Louis metropolitan area such as E001 Back-Up Fire Pump.

10 CSR 10-6.260 *Restriction of Emission of Sulfur Compounds* is applicable to the installation and has been applied within this permit (see Permit Condition 013). The following sulfur compound emission sources are exempt under 10 CSR 10-6.260(1)(A)2 as they exclusively combust pipeline grade natural gas:

Emission Unit	Description
B001	(9) Make-Up Air Units, 40.9 MMBtu/hr
B002	1.75 MMBtu/hr Fire Water Heater
B003	(3) 6.3 MMBtu/hr Boilers
B004	2.6 MMBtu/hr Water Heater
B005	13.5 MMBtu/hr Catalytic Oxidizer
B006	(21) Space Heaters, 2.5 MMBtu/hr
P003	Can Washer Ovens, 6.6 MMBtu/hr
P004	(3) 1.3 MMBtu/hr Basecoater Ovens
P005	(5) 1.3 MMBtu/hr Printer Ovens
P006	(4) 4.2 MMBtu/hr Inside Spray Bake Ovens

10 CSR 10-6.400 *Restriction of Emission of Particulate Matter from Industrial Processes* is applicable to the installation and has been applied within this permit (see Permit Conditions 014 and 015). The following particulate emission sources are exempt as they combust liquid/gaseous fuel not fitting the definition of process weight in 10 CSR 10-6.400(2)(A):

Emission Unit	Description
B001	(9) Make-Up Air Units, 40.9 MMBtu/hr
B002	1.75 MMBtu/hr Fire Water Heater
B003	(3) 6.3 MMBtu/hr Boilers
B004	2.6 MMBtu/hr Water Heater
B005	13.5 MMBtu/hr Catalytic Oxidizer
B006	(21) Space Heaters, 2.5 MMBtu/hr
E001	Back-Up Fire Pump
P003	Can Washer Ovens, 6.6 MMBtu/hr

M001 Grinder is exempt under 10 CSR 10-6.400(1)(B)12 as it has potential uncontrolled particulate emissions below 0.5 lb/hr.

The determinations made with this operating permit are based upon the following plantwide potential to emit:

Pollutant	Potential to Emit (ton/yr) ¹
CO	101.88
CO _{2e}	77,324.01
NH ₃	1.74
NO _x	371.88
PM ₁₀	123.39
PM _{2.5}	116.42
SO _x	21.19
VOC	1,146.16
HAPs	127.88
Glycol Ethers (20-10-0)	124.29

¹Potential emissions are based upon 8,760 hours of uncontrolled annual operation unless otherwise noted:

- The plantwide 560 tons per year hydrocarbon limit (Permit Condition PW001) and 10/25 tons per year HAP limits (Permit Condition PW003 are *not* included in the above calculations. The calculations do include the catalytic reactor required by Permit Condition PW003. The lithographic printing and varnishing operations reported under P005 were given a 50 percent capture and 90 percent destruction efficiency for an overall control efficiency of 45 percent for VOC and HAPs. The basecoating operations reported under P004 and the inside spraying operations reported under P006 were given a 80 percent capture and 90 percent destruction efficiency for an overall control efficiency of 72 percent for VOC and HAPs.
- The 28.24 tons per year VOC limit on Line 3 Inside Spray Machine (Permit Condition 006) and 40 tons per year VOC limit on Line 3 and Respray Inside Spray Machines (Permit Condition 007) were *not* included within the above calculations. The potential emissions of the inside spray machines were based upon 110 percent of the maximum actual usage for the past five years. Actual usage records do not break down usage per inside spray machine.
- The 15 tons per year PM₁₀ limit on P006 Inside Spray Bake Ovens (Permit Condition 008) was included within the above calculations.
- The 68.4 tons per year VOC limit on Line 4 (Permit Condition 009) was *not* included in the above calculations. The potential emission of the lines are based upon 110 percent of the maximum actual usage for each coating operation for the past five years. Actual usage records do not break down usage per line.
- The control device efficiencies for the control devices in Permit Condition 015 were included in the above calculations. P005 Varnishing was given a 98.7 percent control efficiency for a cartridge filter. P005 Printing was given a 98.6 percent control efficiency for a cartridge filter. P004 Basecoating was given a 98.1 percent control efficiency for cartridge filter. P006 Interior Spray Coating was given a 97.6 percent control efficiency for a baghouse.
- This potential to emit is based upon the following coatings (maximum annual usage is based upon the highest usage in the past five years scaled up by ten percent to allow operation growth):

Coating	Maximum Annual Usage (gallons)	Maximum Density (lb/gallon)	% Solids	% VOC	% HAP	% Glycol Ethers	% Xylene	% Ethylbenzene	% Chromium
Inside Spray	454,073	8.45	20.70	79.30	1.00	0.90	-	-	-
Varnish	187,553	9.10	53.00	47.00	13.40	13.40	-	-	-
Printing	23,917	10.84	87.59	12.41	0.24	0.002	-	-	0.22
Basecoating	37,739	10.98	56.50	43.50	2.21	1.10	0.9	0.2	-

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

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

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

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

Prepared by:

Alana L. Rugen
Environmental Engineer

CERTIFIED MAIL: 70093410000190188513
RETURN RECEIPT REQUESTED

Mr. Daniel Brown
Metal Container Corporation
42 Tenbrook Industrial Park
Arnold, MO 63010

Re: Metal Container Corporation, 099-0044
Permit Number: **OP2011-057**

Dear Mr. Brown:

Enclosed with this letter is your Part 70 operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

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

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Alana Rugen at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:ark

Enclosures

c: St. Louis Regional Office
PAMS File: 2011-01-016