



## 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:** OP2011-053  
**Expiration Date:**  
**Installation ID:** 097-0132  
**Project Number:** 2005-06-037

**Installation Name and Address**

Milprint Packaging, LLC – A Bemis Company  
3210 North Progress Street  
Joplin, MO 64801  
Jasper County

**Parent Company's Name and Address**

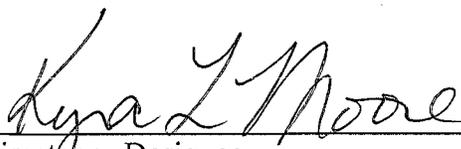
Bemis Company, Inc.  
One Neenah Center, 4<sup>th</sup> Floor  
Neenah, WI 54956

**Installation Description:**

Milprint Packaging, LLC manufactures flexible packaging for food and pharmaceutical operations in Joplin, Missouri. Process operations include flexographic printing, rotogravure printing, adhesive lamination, corona treatment, extrusion lamination, and natural gas-fired drying systems. A catalytic oxidizer system is used to control VOC and HAP emissions. The installation is a major source of volatile organic compound (VOC) emissions for the Title V Program and has established area source limits on hazardous air pollutant (HAP) emissions and synthetic minor limits on VOC for the Prevention of Significant Deterioration (PSD) program.

NOV 14 2011

Effective Date

  
Director or Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Milprint Packaging, LLC manufactures flexible packaging for food and pharmaceutical operations in Joplin, Missouri. Process operations include flexographic printing, rotogravure printing, adhesive lamination, corona treatment, extrusion lamination, and natural gas-fired drying systems. A catalytic oxidizer system is used to control VOC emissions. The installation is a major source of volatile organic compound (VOC) emissions for the Title V Program and has established area source limits on hazardous air pollutant (HAP) emissions and synthetic minor limits on VOC for the Prevention of Significant Deterioration (PSD) program

The following table lists the emissions reported by the installation in the Emissions Inventory Questionnaire (EIQ) for the most recent five years.

Reported Air Pollutant Emissions, tons per year								
Year	Particulate Matter ≤ Ten Microns (PM-10)	Particulate Matter ≤ 2.5 Microns (PM-2.5)	Sulfur Oxides (SO <sub>x</sub> )	Nitrogen Oxides (NO <sub>x</sub> )	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2010	0.22	0.22	0.02	2.88	171.50	2.42	0.00	0.63
2009	0.17	0.17	0.01	2.20	174.02	1.85	0.00	0.68
2008	0.19	0.19	0.01	2.48	157.45	2.08	0.00	0.64
2007	0.20	0.20	0.02	2.58	156.48	2.17	0.00	0.74
2006	0.18	0.18	0.01	2.43	164.86	2.04	0.00	1.00

### 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 of Emission Unit	Emission Point No.
EU0010	Flexographic Press (JF-1): 8-color flexographic press with natural gas-fired drying system	EP01
EU0011	Rotogravure Press (JR-1): 10-color rotogravure press with natural gas-fired drying system	EP02
EU0012	Rotogravure Press (JR-2): 9-color rotogravure press with natural gas-fired drying system	EP06
EU0013	Tandem Extrusion Laminator (JE-1): Extrusion laminator including two coating / printing decks with natural gas-fired drying system	EP08
EU0014	Extrusion Coater Laminator (JE-2), with a natural gas-fired drying system	EP10
EU0015	Tandem Extrusion Laminator (JE-1): Third coating / printing deck for extrusion laminator, with natural gas-fired drying system	EP08b
EU0020	Adhesive Laminator (JA-1): Adhesive laminator with a natural gas-fired drying system and a combining station	EP03

Emission Unit #	Description of Emission Unit	Emission Point No.
EU0030	Catalytic Thermal Oxidizer System: Three catalytic oxidizers with aggregate 34.59 MMBtu/hr capacity	EP11

**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 of Emission Unit	Emission Point No.
EU0100	Solventless Adhesive Laminator (JA-2)	EP04
EU0040	Miscellaneous Natural Gas Combustion: 16 Heating Units with an aggregate 36.5 MM Btu/hr capacity	EP12
EU0110	Parts Washer Operations and Solvent Storage	EP05
EU0120	Solvent Recovery Still for Parts Washers	N/A
EU0130	Corona Treaters	N/A
EU0140	Resin Pellet Storage Silos	N/A
EU0150	Raw Material Storage and Mixing Rooms	N/A
EU0160	Waste Storage and Mixing Areas	N/A
	Tank Farm	
	Ozonator on JE-1	
	Laser Perforation Unit	
	Die Exhaust	
	Trim Chopper/Compaction Systems	

## 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 022004-008A

**Emission Limitations:**

Bemis Flexible Packaging – Milprint Division shall emit less than 250.0 tons of Volatile Organic Compounds (VOCs) in any consecutive 12-month period from the entire installation. (see Table 1)

**Table 1: All VOC Emissions Points for Bemis Flexible Packaging – Milprint Division**

<b>Emission Point</b>	<b>Description</b>
EP-01	8-Color Flexographic Press
EP-02	10-Color Rotogravure Press
EP-03	Adhesive Laminator
EP-04	Solventless Adhesive Laminator
EP-05	Parts Washer
EP-06	9-color Rotogravure Press
EP-08	Tandem Coextrusion Laminator
EP-08B	Tandem Coextrusion Laminator 3 <sup>rd</sup> Deck
EP-10	Tandem Extrusion Laminator JE-2
EP-11	VOC Oxidizer System
EP-12	Natural Gas Combustion
T-1A	Above Ground Tank
T-1B	Above Ground Tank
T-2A	Above Ground Tank
T-2B	Above Ground Tank
T-3A	Above Ground Tank
T-3B	Above Ground Tank

**Monitoring / Record Keeping Requirements:**

- 1) The permittee shall calculate monthly VOC emissions associated with all sources at this installation. The permittee shall record all VOC emissions on a monthly basis and then compiled into a consecutive 12-month running total.
- 2) Record keeping logs, containing, at a minimum, the information identified in Appendix E, must be maintained to demonstrate compliance with the emission limit above. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.

- 3) The permittee shall maintain these records on site for five years and shall make them immediately available to any Department of Natural Resources' personnel upon request. [Special Condition 2B]
- 4) Records shall include Material Safety Data Sheets (MSDS) for all materials used.

**Reporting Requirements:**

- 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, if the consecutive 12-month total records show that the source exceeded the 250 tons of VOC emissions limitation.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

**PERMIT CONDITION PW002**

10 CSR 10-6.065(6)(C)2.A. *Voluntary Limitation(s)*

**Emission / Operational Limitation:**

The permittee shall emit less than 10 tons of any individual hazardous air pollutant (HAP) and less than 25 tons of hazardous air pollutants (HAPs) in aggregate during any consecutive 12-month period.

**Monitoring / Record Keeping Requirements:**

- 1) The permittee shall maintain accurate records of the information necessary to calculate monthly HAP emissions from all sources including process equipment and fugitive emissions from equipment clean-up. In addition, the permittee shall quantify any HAP emissions diverted from the oxidizer and vented to the atmosphere, uncontrolled, through the process exhaust by-pass exhaust stack as a result of a control system malfunction. Records shall include Material Safety Data Sheets for the HAP-containing materials used, throughputs for the HAP-containing materials used, the mass fraction of each HAP present in the HAP-containing materials used, equipment operating hours, and records of any upset conditions.
- 2) The permittee shall calculate monthly HAP emissions associated with all sources at this installation. The permittee shall record all HAP emissions on a monthly basis with a consecutive 12-month total.
- 3) Attachment F contains a log satisfying these record keeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- 4) The permittee shall maintain these records on site for the most recent 60 months.
- 5) The permittee shall immediately make such records available to any Department of Natural Resources' personnel upon request.

**Reporting Requirements:**

- 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, if the consecutive 12-month total records show that the source exceeded the limitation ten tons of individual HAP emissions or 25 tons of aggregate HAP emissions.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

**PERMIT CONDITION PW003**

10 CSR 10-6.060 *Construction Permits Required*  
Construction Permit 0198-019, Issued December 24, 1997  
Construction Permit 122002-001, Issued November 18, 2002

**Emission / Operational Limitation:**

If in the opinion of the Director, a continuing situation of demonstrated nuisance odors exists in violation of 10 CSR 10-6.165, the Director may require the permittee to submit a corrective action plan within ten (10) days adequate to timely and significantly mitigate the odors. The permittee shall implement any such plan immediately upon its approval by the Director. Failure to either submit or implement such a plan shall be a violation of construction permits issued.

**Monitoring / Record Keeping Requirements:**

- 1) None, unless a corrective action plan is required to be implemented and such plan specifies requirements.
- 2) The permittee shall maintain any records on site for the most recent 60 months.
- 3) The permittee shall immediately make such records available to any Department of Natural Resources' personnel upon request.

**Reporting Requirements:**

- 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 violation, if the nuisance odors show that the source violated the regulation.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

**PERMIT CONDITION PW004**

10 CSR 10-6.060 *Construction Permits Required*  
Construction Permit 122002-001, Issued November 18, 2002  
Construction Permit 022004-008A

**Emission / Operational Limitation:**

- 1) The installation shall keep all inks and solvents and cleaning solutions in sealed containers whenever the materials are not in use.
- 2) The installation shall provide and maintain suitable, easily read, permanent or affixed markings identifying the contents on all VOC- and HAP-containing ink, solvent and cleaning solution containers used with this equipment while the containers are in use.

**Monitoring / Record Keeping Requirements:**

- 1) The permittee shall conduct and document routine inspections to confirm that the standard operating procedures are observed.
- 2) The permittee shall maintain inspection records for a minimum of five years.
- 3) The permittee shall immediately make such records available to any Department of Natural Resources' personnel upon request.

**Reporting Requirements:**

Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

### III. Emission Unit Specific Emission Limitations

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

<b>EU0010, EU0011, EU0012, EU0013 and EU0014 – Flexographic Printers, Rotogravure Printers, and Extrusion Laminators with Dryers</b>			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0010	Flexographic Press (JF-1): 8-color flexographic press with natural gas-fired drying system	PCMC, Model 7866 "Encore" (1998)	EP01
EU0011	Rotogravure Press (JR-1): 10-color rotogravure press with natural gas-fired drying system	Rotomec, Rotopak 3000-Z (1998)	EP02
EU0012	Rotogravure Press (JR-2): 9-color rotogravure press with natural gas-fired drying system	Rotomec, Rotopak 3000-Z (1998)	EP06
EU0013	Tandem Extrusion Laminator (JE-1) [decks one and two] with natural gas-fired drying system	Black - Clawson, Custom (1998)	EP08
EU0014	Extrusion Coater Laminator (JE-2) with natural gas-fired drying system	Black - Clawson, Custom (2004)	EP10
	Emissions controlled by the EU0030 Catalytic Oxidizer System		EP11

**PERMIT CONDITION (EU0010 through EU0014)-001**  
 10 CSR 10-6.060 *Construction Permits Required*  
 Construction Permit 0198-019, Issued December 24, 1997  
 Construction Permit 022004-008A  
 40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

**Emission / Operational Limitation:**

- 1) Emissions from the flexographic and rotogravure presses (EU0010, EU0011, and EU0012) and the extrusion laminators (EU0013 and EU0014) shall be vented to the catalytic oxidizers listed in EU0030.
- 2) The EU0030 oxidizer system shall be in operation at all times when these units are in use. The oxidizer system shall achieve at least 95 percent VOC destruction by weight and shall provide an overall control efficiency of 85.5 percent by weight for each emission unit.
- 3) The EU0030 catalytic oxidizer, requirements are described in permit condition EU0030-001.

**Monitoring / Record Keeping Requirements:**

- 1) For VOC capture system monitoring, corrective action, record keeping, and reporting provisions for each emission unit, refer to the CAM Plan for Unenclosed Press or Coater (as appropriate) connected to the Oxidizer System.
- 2) All records shall be maintained for a minimum of five years.
- 3) All records shall be made available immediately for inspection to Missouri Department of Natural Resources' personnel upon request.

**Reporting Requirements:**

- 1) The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determines that any exceedance of the permit conditions has occurred.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semiannually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit

**PERMIT CONDITION (EU0010 through EU0015 and EU0020)-002**

10 CSR 10-6.075 *Maximum Achievable Control Technology Regulations*  
40 CFR Part 63 Subpart KK, *National Emission Standards for the Printing and Publishing Industry*

**Emission Limitations:**

- 1) Each product and packaging rotogravure or wide-web flexographic printing affected source shall limit organic HAP emissions to no more than five percent of the organic HAP applied for the month; or to no more than four percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month; or to no more than 20 percent of the mass of solids applied for the month; or to a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month. [§63.825(a)]
- 2) Table 1 to this Subpart provides cross references to the 40 CFR Part 63, Subpart A, general provisions, indicating the applicability of the general provisions requirements to this subpart.

**Compliance Demonstration Options:**

The owner or operator of each product and packaging rotogravure or wide-web flexographic printing affected source shall demonstrate compliance with this standard by following one of the procedures below: [§63.825(a)]

- 1) Demonstrate that each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied during the month contains no more than 0.04 weight-fraction organic HAP, on an as-purchased basis, as determined in accordance with §63.827(b)(2).
- 2) Demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied during the month contains no more than 0.04 weight-fraction organic HAP, on a monthly average as-applied basis as determined in accordance with Paragraphs (b)(2)(i)–(ii) of this section. The owner or operator shall calculate the as-applied HAP content of materials which are reduced, thinned, or diluted prior to application, as follows:
  - a) Determine the organic HAP content of each ink, coating, varnish, adhesive, primer, solvent, diluent, reducer, thinner, and other material applied on an as-purchased basis in accordance with §63.827(b)(2).
  - b) Calculate the monthly average as-applied organic HAP content,  $C_{ahi}$  of each ink, coating, varnish, adhesive, primer, and other solids-containing material using Equation 3.

$$C_{ahi} = \frac{\left( C_{hi} M_i + \sum_{j=1}^q C_{hj} M_{ij} \right)}{M_i + \sum_{j=1}^q M_{ij}} \quad Eq\ 3$$

- c) Demonstrate that each ink, coating, varnish, adhesive, primer, and other solids-containing material applied, either
  - a) Contains no more than 0.04 weight-fraction organic HAP on a monthly average as-applied basis, or
  - b) Contains no more than 0.20 kg of organic HAP per kg of solids applied, on a monthly average as-applied basis.
- 4) Demonstrate that the monthly average as-applied organic HAP content, HL, of all materials applied is less than 0.04 kg HAP per kg of material applied, as determined by Equation 6.

$$H_L = \frac{\sum_{i=1}^p M_i C_{ki} + \sum_{j=1}^q M_j C_{kj}}{\sum_{i=1}^p M_i + \sum_{j=1}^q M_j} \quad \text{Eq 6}$$

- 5) Demonstrate that the monthly average as-applied organic HAP content on the basis of solids applied, Hs, is less than 0.20 kg HAP per kg solids applied as determined by Equation 7.

$$H_s = \frac{\sum_{i=1}^p M_i C_{ki} + \sum_{j=1}^q M_j C_{kj}}{\sum_{i=1}^p M_i C_{si}} \quad \text{Eq 7}$$

- 6) Demonstrate that the total monthly organic HAP applied, Happ, as determined by Equation 8, is less than the calculated equivalent allowable organic HAP, Ha, as determined by Paragraph (e) of this section.

$$H_{app} = \sum_{i=1}^p M_i C_{ki} + \sum_{j=1}^q M_j C_{kj} \quad \text{Eq. 8}$$

Where:

Happ= Total monthly organic HAP applied, kg.

**Performance Testing Requirements:**

Performance tests shall be conducted under such conditions as the Administrator specifies to the owner or operator based on representative performance of the affected source for the period being tested. Upon request, the owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of performance tests. The owner or operator shall conduct performance tests using the methods and criteria as required by §63.827.

**Reporting Requirements:**

- 1) The record keeping provisions of 40 CFR Part 63 Subpart A of this part that apply and those that do not apply to owners and operators of affected sources subject to this subpart are listed in Table 1 of this subpart.
- 2) Each owner or operator of an affected source subject to this subpart shall maintain records of all liquid-liquid material balances performed in accordance with the requirements of §§63.824–63.825 of this subpart. The records shall be maintained in accordance with the requirements of §63.10(b) of this part.
- 3) The owner or operator of each facility which commits to the criteria of §63.820(a)(2) shall maintain records of all required measurements and calculations needed to demonstrate compliance with these criteria, including the mass of all HAP containing materials used and the mass fraction of HAP present in each HAP containing material used, on a monthly basis.

- 4) The owner or operator of each facility which meets the limits and criteria of §63.821(b)(1) shall maintain records as required in Paragraph (a) below. The owner or operator of each facility which meets the limits and criteria of §63.821(b)(2) shall maintain records as required in Paragraph (b) below. Owners or operators shall maintain these records for five years, and upon request, submit them to the Administrator.
  - a) For each facility which meets the criteria of §63.821(b)(1), the owner or operator shall maintain records of the total mass of each material applied on product and packaging rotogravure or wide-web flexographic printing presses during each month.
  - b) For each facility which meets the criteria of §63.821(b)(2), the owner or operator shall maintain records of the total mass and organic HAP content of each material applied on product and packaging rotogravure or wide-web flexographic printing presses during each month.
- 5) The owner or operator choosing to exclude from an affected source, a product and packaging rotogravure or wide-web flexographic press which meets the limits and criteria of §63.821(a)(2)(ii)(A) shall maintain the records specified in Paragraphs (a) and (b) below for five years and submit them to the Administrator upon request:
  - a) The total mass of each material applied each month on the press, including all inboard and outboard stations, and
  - b) The total mass of each material applied each month on the press by product and packaging rotogravure or wide-web flexographic printing operations.
- 6) Each owner or operator of an affected source subject to this subpart shall maintain records of the occurrence and duration of each malfunction of operation ( i.e., process equipment), air pollution control equipment, or monitoring equipment.
- 7) Each owner or operator of an affected source subject to this subpart shall maintain records of actions taken during periods of malfunction to minimize emissions in accordance with §63.823(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.

**Reporting Requirements:**

- 1) The reporting provisions of 40 CFR Part 63 Subpart A of this part that apply and those that do not apply to owners and operators of affected sources subject to this subpart are listed in Table 1 of this subpart.
- 2) Each owner or operator of an affected source subject to this subpart shall submit the reports specified below of this section to the Administrator:
  - a) An initial notification required in §63.9(b).
  - b) A Notification of Performance Tests specified in §§63.7 and 63.9(e) of this part. This notification, and the site-specific test plan required under §63.7(c)(2) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan shall be considered to be approved unless explicitly disapproved, or unless comments received from the Administrator require monitoring of an alternate parameter.
  - c) A Notification of Compliance Status specified in §63.9(h) of this part.
  - d) Performance test reports specified in §63.10(d)(2) of this part.
  - e) A summary report specified in §63.10(e)(3) of this part shall be submitted on a semi-annual basis (i.e., once every 6-month period). These summary reports are required even if the affected source does not have any control devices or does not take the performance of any control devices into account in demonstrating compliance with the emission limitations. In addition to a report

of operating parameter exceedances as required by §63.10(e)(3)(i), the summary report shall include, as applicable:

- i) Exceedances of the standards in §§63.824–63.825.
  - ii) Exceedances of either of the criteria of §63.820(a)(2).
  - iii) Exceedances of the criterion of §63.821(b)(1) and the criterion of §63.821(b)(2) in the same month.
  - iv) Exceedances of the criterion of §63.821(a)(2)(ii)(A).
  - v) The number, duration, and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with §63.823(b), including actions taken to correct a malfunction.
- 3) All reports required by this subpart not subject to the requirements in Paragraph (c)(1) of this section must be sent to the Administrator at the appropriate address listed in §63.13. If acceptable to both the Administrator and the owner or operator of a source, these reports may be submitted on electronic media. The Administrator retains the right to require submittal of reports subject to Paragraph (c)(1) of this section in paper format.

<b>EU0020 – Adhesive Laminator</b>			
Emission Unit	Description	Manufacturer/Model #	2006 EIQ Reference #
EU0020	Adhesive Laminator (JA-1) with natural gas-fired drying system	FMC Pagendarm Lamicoater (1998)	EP03

**PERMIT CONDITION EU0020-001**  
 10 CSR 10-6.060 *Construction Permits Required*  
 Construction Permit 0198-019, Issued December 24, 1997  
 40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

**Emission / Operational Limitations:**

- 1) The adhesive laminator coating deck (EU0020) shall be totally enclosed with a VOC capture efficiency of 100 percent (100 percent).
- 2) Emissions from the adhesive laminator (EU0020) shall be vented to the catalytic oxidizers listed in EU0030.
- 3) The EU0030 oxidizer system shall be in operation at all times when this unit is in use. The oxidizer system shall achieve at least 95 percent VOC destruction by weight and shall provide an overall control efficiency of 85.5 percent by weight.
- 4) The EU0030 catalytic oxidizer requirements are described in permit condition EU0030-001.

**Monitoring/Record Keeping Requirements:**

- 1) For VOC capture system monitoring, corrective action, record keeping, and reporting provisions for EU0020, refer to the CAM Plan for Permanent Total Enclosure Connected to the Oxidizer System.
- 2) The permittee shall verify that the enclosure has a capture efficiency of 100 percent using the applicable procedures described in U.S. EPA Method 204.
- 3) The permittee shall maintain records of any performance tests conducted on the enclosure for EU0020.

- 4) Records of performance tests shall be maintained for a minimum of five years or until a new test is performed, whichever is longer. All other records shall be maintained for a minimum of five years.
- 5) All records shall be made available immediately for inspection to Missouri Department of Natural Resources' personnel upon request.

**Reporting Requirements:**

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determines that any exceedance of the permit conditions has occurred.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and Section V of this permit.

<b>EU0030 – Catalytic Thermal Oxidizers</b>			
<b>Emission Unit</b>	<b>Description</b>	<b>Manufacturer/Model #</b>	<b>2006 EIQ Reference #</b>
EU0030	Catalytic Thermal Oxidizer (12.095 MM Btu/hr)	Megtec Systems, Magnum 30,000 SCFM (1998)	EP11a
EU0030	Catalytic Thermal Oxidizer (12.095 MM Btu/hr)	Megtec Systems, Magnum 30,000 SCFM (1998)	EP11b
EU0030	Catalytic Thermal Oxidizer (10.40 MM Btu/hr)	Megtec Systems, Magnum 24,000 SCFM (2003)	EP11c

**PERMIT CONDITION EU0030-001**  
 10 CSR 10-6.060 *Construction Permits Required*  
 Construction Permit 0198-019, *Issued December 24, 1997*  
 Construction Permit 022004-008A  
 40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

**Emission / Operational Limitations:**

- 1) The catalytic oxidizers shall be operated in accordance with manufacturer's specifications.
- 2) The catalytic oxidizers shall maintain an average operating temperature for all three-hour periods of operation that is no greater than (50°F) below the catalytic oxidizer control set point temperature established during the most recent performance test which demonstrated compliance.
- 3) The exhaust stacks for the catalytic oxidizer(s) must be constructed at least 57 meters from the nearest property boundary and must be at least 13.7 meters tall.

**Monitoring Requirements:**

**Continuous Monitoring Requirements**

- 1) The permittee shall install, calibrate, certify, operate, and maintain, according to the manufacturer's specifications, a continuous temperature monitoring system while the oxidizers are in use and controlling process emissions as specified below:
  - a) The device shall be capable of monitoring temperature with an accuracy of +/- one percent (1 percent) of the temperature being monitored in degrees Celsius, or +/- one degree Celsius (1°C), whichever is greater.
  - b) The thermocouple or temperature sensor shall be installed in the vent stream at the nearest feasible point to the catalyst bed inlet.

- c) The permittee may modify or change the continuous temperature monitoring system upon demonstrating to the Director's satisfaction that the alternative monitoring system demonstrates continuous compliance with the temperature monitoring requirements described in [1)a) and b)] above.
- 2) The permittee shall keep an up-to-date, readily accessible record of the continuous temperature monitoring data.

Inspection / Maintenance Requirements

- 3) The permittee shall maintain an operating and maintenance log for each oxidizer which records the following:
  - a) Incidents of malfunction resulting in increased emissions, duration of event, probable cause, and corrective actions; and
  - b) Maintenance activities, with inspection schedule, repair actions, and replacements or additions of components.
  - c) Attachment D contains a log satisfying these record keeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.

Performance Testing Requirements

- 4) The permittee shall conduct at least one performance test on the catalytic oxidizer systems that demonstrate at least 95 percent VOC destruction by weight in accordance with Methods 1 through 4 and 25A of 40 CFR Part 60, Appendix A.
- 5) The permittee shall conduct additional performance tests as described in the CAM Plan for the Oxidizer System.
- 6) The test protocol and testing schedule shall be pre-approved by the Missouri Air Pollution Control Program Enforcement Section.

General, All

- 7) Records of performance tests shall be maintained for a minimum of five years or until a new test is performed, whichever is longer. All other records shall be maintained for a minimum of five years.
- 8) All records shall be made available immediately for inspection to Missouri Department of Natural Resources' personnel upon request.

Compliance Assurance Monitoring Requirements

Table 1: VOC Oxidizer System

	<b>Indicator #1</b>	<b>Indicator #2</b>	<b>Indicator #3</b>	<b>Indicator #4</b>
I. Indicator	Catalyst bed inlet temperature <sup>a</sup>	Work practice/inspection	Performance test	Catalyst activity assessment
Measurement approach	Continuously record the operating temperature of the inlet to the catalyst bed of each operating oxidizer	Inspect internal and external structural integrity of each oxidizer to ensure proper operation <sup>b</sup>	Conduct emission test for each oxidizer to demonstrate compliance with permitted destruction efficiency	Determine the catalyst activity level for each oxidizer by evaluating the conversion efficiency
II. Indicator Range	Whenever a connected process is in operation an excursion is identified as a catalyst bed inlet temperature measurement of more than 50° F below the setpoint temperature used to demonstrate compliance during the most recent VOC emission test, or as any three-hour period when the average catalyst bed inlet temperature is less than the setpoint temperature used to demonstrate compliance during the most recent VOC emission test.	An excursion is identified as any finding that the structural integrity of an oxidizer has been jeopardized and it no longer operates as designed	An excursion is identified as any finding that an oxidizer does not meet the permitted destruction efficiency	The conversion efficiency is evaluated and compared to typical values for fresh catalyst. An excursion is identified as a finding that the conversion efficiency is beyond the operational range of the catalyst as defined by the manufacturer
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement

III. Performance Criteria				
A. Data Representativeness	Any temperature monitoring device employed to measure catalyst bed inlet temperature shall be accurate to within one percent of temperature measured or plus/minus one degrees C, whichever is greater	Inspections of the oxidizer system will identify problems	A test protocol shall be prepared and (if necessary) approved by the regulatory agency prior to conduction the performance test	Analysis will determine the conversion efficiency of each oxidizer’s catalyst
B. Verification of Operation Status	Temperatures recorded on chart paper or electronic media	Inspection records	Not applicable	Not applicable
C. QA/QC Practices and Criteria	Validation of temperature system conducted annually. Acceptance criteria plus or minus 20 degrees F <sup>a</sup>	Not applicable	U.S. EPA test methods approved in agency’s rules or in test protocol	Not applicable
D. Monitoring Frequency	Measured Continuously	External inspection monthly; internal inspection annually <sup>c</sup>	Once every five years	Annually
Data Collection Procedure	Recorded at least every 15-minutes on a chart or electronic media	Recorded results of inspections and observations	Per approved test methods	Record results of catalyst sample analyses
Averaging Period	Not applicable if using any measured value as indicator. Three hours if using 3-hour average as indicator	Not applicable	Not applicable	Not applicable

E. Record Keeping	Maintain for a period of five years records of chard recorder paper or electronic media and corrective actions taken in response to excursions	Maintain for a period of five years records of inspections and corrective actions taken in response to excursions	Maintain a copy of the test report for each oxidizer for five years or until another test is conducted. Maintain records of corrective actions taken in response to excursions	Maintain for a period of five years records of catalyst analyses and corrective actions taken in response to excursions
F. Reporting	Number, duration, cause of any excursion and the corrective action taken	Number, duration, cause of any excursion and the corrective action taken	Submit test protocol and notification of testing to regulatory agency 30 days prior to test date. Submit test report 60 days after conducting a performance test	Number, duration, cause of any excursion and the corrective action taken
Frequency	Semi-annually	Semi-annually	For each performance test conducted	Semi-annually

<sup>a</sup> Procedure for verifying accuracy maintained on-site.

<sup>b</sup> Internal inspection includes annual assessment of each oxidizer’s heat exchanger for leakage (this assessment may be comprised of an internal inspection, or other method of assessing for leakage).

<sup>c</sup> Evaluation of each catalytic oxidizer’s VOC destruction efficiency using a flame ionization analyzer (FIA) for three 20-minute runs, will serve in lieu of an internal inspection of each oxidizer. This evaluation does not require submittal of a test protocol to the regulatory agency (or approval by the regulatory agency) or submittal of test reports.

Table 2: VOC Oxidizer System – Capture System: Permanent Total Enclosure for EU0020 Adhesive Laminator

	<b>Indicator #1</b>	<b>Indicator #2</b>	<b>Indicator #3</b>
Indicator Measurement Approach	Work Practice Inspect the operational condition of the control device bypass damper, the integrity of the exhaust system from the process to the control device, and the integrity of the enclosure	Work Practice Inspect operational condition of bypass damper position interlock	Pressure Differential Monitor pressure differential across the enclosure wall and the surrounding atmosphere
Indicator Range	An excursion is identified as any finding that the integrity of the bypass	An excursion is identified as any finding that the bypass interlock is inoperative	An excursion is defined as a pressure differential of less than -0.007 inches w.c. for five

	damper, the exhaust system ductwork, or the enclosure have been compromised		consecutive minutes while the process is operating; alternatively, a smaller differential (i.e., less than -0.007 in w.c.) can be used as the indicator if such a differential is demonstrated as adequate to qualify the permanent total enclosure with U.S. EPA Method 204 criteria
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement	Any excursion shall require that the process be immediately shut down and remain down until the problem can be corrected. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement.	Each excursion triggers as assessment of the problem, corrective action and a reporting requirement
Performance Criteria A. Data Representativeness	Properly positioned dampers, leak-free ductwork and a leak-free enclosure of the process will assure that all of the exhaust will reach the control device. Inspections will identify problems	Properly operating interlocks will assure that the process(es) will be shut down if the bypass damper is open to the atmosphere (except during process dryer purge) (i.e., start-up)	The monitor measures the pressure differential at the interface between the wall of the enclosure and surrounding atmospheres.
B. Verification of Operation Status	Inspection records	Inspection records	Not applicable
C. QA/QC Practices and Criteria	Not applicable	Not applicable	Validation of instrument calibration conducted annually. Compare to calibrated meter, or calibrate using pressure standard, or according to manufacturer's instruction

D. Monitoring Frequency	Semi-annually.	Annually	Monitor continuously
Data Collection Procedure	Record results of inspections and observations	Record results of inspections and observations	Record at least once every minute on a chart or electronic media
Averaging Period	Not applicable	Not applicable	Not applicable
E. Record Keeping	Maintain for a period of five years records of inspections and of corrective actions taken in response to excursions	Maintain for a period of five years records of data and of corrective actions taken in response to excursions	Maintain for a period of five years records of data and of corrective actions taken in response to excursions
F. Reporting	Number, duration, cause of any excursion and the corrective action taken	Number, duration, cause of any excursion and the corrective action taken	Number, duration, cause of any excursion and the corrective action taken
Frequency	Semi-annually	Annually	Semi-annually

Note: Indication of flow control position for bypass dampers (located in the exhaust gas capture system between the process unit and the oxidizer system) is continuously provided at the oxidizer control panel view screen.

Table 3: VOC Capture System: Unenclosed Presses Connected to Oxidizer System<sup>a</sup>

	<b>Indicator #1</b>	<b>Indicator #2</b>	<b>Indicator #3</b>
I. Indicator Measurement Approach	Work Practice Inspect the operational condition of the control device bypass damper and the integrity of the exhaust system from the process to the control device	Work Practice Inspect the operational condition of all interlocks including: dryer flow and bypass damper position	Work Practice Use a smoke stick or equivalent approach to assure the dryer is negative with respect to the surrounding atmosphere
II. Indicator Range	An excursion is identified as any finding that the integrity of the bypass damper or the exhaust system ductwork has been compromised	An excursion is defined as any finding that any interlock is inoperative	General overall flow of smoke should be into the dryer web slot or application capture area
Corrective Action	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement	Any excursion shall require that the process be immediately shut down and remain down until the problem can be corrected. Each excursion triggers an	Process cannot be operated until negative flow into the dryer system or application area is demonstrated. Each excursion triggers an

		assessment of the problem, corrective action and a reporting requirement	assessment of the problem, corrective action and a reporting requirement
III. Performance Criteria			
A. Data Representativeness	Properly positioned dampers and leak-free ductwork will assure that all of the normally captured exhaust will reach the control device. Inspections will identify problems	Properly operating interlocks will assure that the process will be shut down if there is insufficient flow or the bypass damper is open to the atmosphere	Monitoring approach will assure the dryer is set to properly contain supply air and the airflow is into the application capture area
B. Verification of Operation Status	Inspection records	Inspection records	Not applicable
C. QA/QC Practices and Criteria	Not applicable	Not applicable	Not applicable
D. Monitoring Frequency	Semi-annually	Annually	Whenever the location of a between color dryer is disrupted. (This may not be necessary for two piece dryers)
Data Collection Procedure	Record results of inspections and observations	Record results of inspections and observations	Not applicable
Averaging Period	Not applicable	Not applicable	Not applicable
E. Record Keeping	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions	Maintain for a period of 5 years records of inspections and of corrective actions taken in response to excursions.
F. Reporting	Number , duration, cause of any excursion and the corrective action taken	Number , duration, cause of any excursion and the corrective action taken	Number , duration, cause of any excursion and the corrective action taken
Frequency	Semi-annually	Annually	Semi-annually

<sup>a</sup> Indication of flow control position for bypass dampers (located in the exhaust gas capture system between the process unit and the oxidizer system) is continuously provided at the oxidizer control panel view screen.

Table 4: VOC Capture System: Unenclosed Coaters Connected to Oxidizer System<sup>a</sup>

	<b>Indicator #1</b>	<b>Indicator #2</b>	<b>Indicator #3</b>
I. Indicator Measurement Approach	Work Practice Inspect the operational condition of the control device bypass damper and the integrity of the exhaust system from the process to the control device	Exhaust Flow Continuously monitor an indicator of flow of the process line exhaust system. Monitor either the static pressure, or a direct measure of flow	Work Practice Use a smoke stick or equivalent approach to assure the dryer is negative with respect to the surrounding atmosphere
II. Indicator Range  Corrective Action	An excursion is identified as any finding that the integrity of the bypass damper or the exhaust system ductwork has been compromised	Establish the indicator range at a value greater than 85 percent of the average value measured during the most recent capture efficiency performance test. Establish the indicator range based upon the test data, historical data and engineering judgment	General overall flow of smoke should be into the dryer web slot or application capture area
	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement	Each excursion triggers an assessment of the problem, corrective action and a reporting requirement	Process cannot be operated until negative flow into the dryer system or application area is demonstrated. Each excursion triggers an assessment of the problem, corrective action and a reporting requirement
IV. Performance Criteria A. Data Representativeness	Properly positioned dampers and leak-free ductwork will assure that all of the normally captured exhaust will reach the control device. Inspections will identify problems	Continuously monitoring an indicator of flow will assure that adequate flow to achieve the designed capture rate is maintained	Monitoring approach will assure the dryer is set to properly contain supply air and the airflow is into the application capture area
B. Verification of Operation Status	Inspection records	Upon installation, compare to measured flow using a standard	Not applicable

		flow measurement technique (e.g., EPA Method 2) per manufacturer's instruction	
C. QA/QC Practices and Criteria	Not applicable	Confirm proper operation and calibration of sensor annually - <ul style="list-style-type: none"> <li>• Static pressure: compare to calibrated meter or manometer, or</li> <li>• Flow sensor: compare to a measure value using a standard method (e.g., EPA Method 2)</li> </ul>	Not applicable
D. Monitoring Frequency	Semi-annually	At least four times per hour	Whenever the location of a between color dryer is disrupted. (This may not be necessary for two piece dryers)
Data Collection Procedure	Record results of inspections and observations	Data acquisition system or chart recorder	Not applicable
Averaging Period	Not applicable	One hour	Not applicable
E. Record Keeping	Maintain for a period of five years records of inspections and of corrective actions taken in response to excursions	Maintain for a period of five years records of inspections and of corrective actions taken in response to excursions	Maintain for a period of five years records of inspections and of corrective actions taken in response to excursions.
F. Reporting	Number , duration, cause of any excursion and the corrective action taken	Number , duration, cause of any excursion and the corrective action taken	Number , duration, cause of any excursion and the corrective action taken
Frequency	Semi-annually	Semi-annually	Semi-annually

<sup>a</sup>Indication of flow control position for bypass dampers (located in the exhaust gas capture system between the process unit and the oxidizer system) is continuously provided at the oxidizer control panel view screen.

**Record Keeping Requirements:**

- 1) All records shall be made available immediately for inspection to Missouri Department of Natural Resources' personnel upon request.
- 2) All records shall be maintained for a minimum of five years.

**Reporting Requirements:**

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determines that any exceedance of the permit conditions has occurred.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted semi-annually, in the semi-annual excess emissions and continuous monitoring report and annual compliance certification, as required by 10 CSR 10-6.065(6)(C)1.C.(III) and 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) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued. The following 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:
    1. Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
    2. Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
    3. St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
    4. St. Louis metropolitan area. The open burning of household refuse is prohibited;
  - b) Land clearing of vegetative debris, provided all burning occurs -
    1. Outside of any incorporated area or municipality and outside of the Kansas City metropolitan area, Springfield-Greene County area, and the St. Louis metropolitan area;
    2. At least two hundred (200) yards from the nearest occupied structure; and
    3. Land clearing of vegetative debris that does not meet the conditions of Subparagraphs d)(1) and d)(2) of this rule may be open burned provided an open burning permit is obtained as found in Paragraph 3) below;
  - c) Yard waste, with the following exceptions:
    1. Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
    2. Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
    3. St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
      - i. A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;

- ii. A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
  - iii. The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
  - iv. In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the Department Director; and
4. St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- d) Fire training exercises. Fires set for the purposes of training fire fighters and industrial employees in fire fighting methods provided that -
1. The training is conducted in accordance with National Fire Protection Association standards, NFPA 1403, Standard on Live Fire Training Evolutions (2002 Edition), for fire fighters and NFPA 600, Standard on Industrial Fire Brigades (2005 Edition), for industrial employees. The provisions of NFPA 1403 and 600 shall apply and are hereby incorporated by reference in this rule, as published by the National Fire Protection Association, 11 Tracy Drive, Avon, MA 02322. This rule does not incorporate any subsequent amendments or additions. These exercises include, but are not limited to, liquefied gas propane fueled simulators, flashover simulators and stationary live burn towers; and
  2. Acquired structures to be used for training exercises are subject to the requirements of 10 CSR 10-6.080, Subsection (3)(M), National Emission Standard for Asbestos. These requirements include, but are not limited to, inspection of and notification to the Director. All petroleum-based products are to be removed from any acquired structure that is to be burned as part of a training exercise.
- 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 Milprint Packaging, LLC – A Bemis Company fails to comply with the conditions or any provisions of the permit.
- 4) The permittee may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if the permittee fails to comply with the provisions or any condition of the open burning permit.
- 5) In a nonattainment area, as defined in 10 CSR 10-6.020, Paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 6) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005 shall apply and are hereby

incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.

- 7) 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 10-6.110 Submission of Emission Data, Emission Fees and Process Information**

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) annually.
- 2) The permittee may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 5) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by April 1 after the end of each reporting period unless granted an extension for online filing until May 1.
- 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 twelve (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.

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

**Emission Limitation:**

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

**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.

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

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
  - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
  - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
  - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
  - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
  - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82.*

<b>10 CSR 10-6.280 Compliance Monitoring Usage</b>
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| <p>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:</p> <ul style="list-style-type: none"><li>a) Monitoring methods outlined in 40 CFR Part 64;</li><li>b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and</li><li>c) Any other monitoring methods approved by the Director.</li></ul> <p>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:</p> <ul style="list-style-type: none"><li>a) Monitoring methods outlined in 40 CFR Part 64;</li><li>b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, “Operating Permits”, and incorporated into an operating permit; and</li><li>c) Compliance test methods specified in the rule cited as the authority for the emission limitations.</li></ul> <p>3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:</p> <ul style="list-style-type: none"><li>a) Applicable monitoring or testing methods, cited in:<ul style="list-style-type: none"><li>i) 10 CSR 10-6.030, “Sampling Methods for Air Pollution Sources”;</li><li>ii) 10 CSR 10-6.040, “Reference Methods”;</li><li>iii) 10 CSR 10-6.070, “New Source Performance Standards”;</li><li>iv) 10 CSR 10-6.080, “Emission Standards for Hazardous Air Pollutants”; or</li></ul></li><li>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.</li></ul> |
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## V. General Permit Requirements

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

None

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The application utilized in the preparation of this permit was signed by Mark Allan, Site Leader. On November 15, 2010, a letter was sent to the Department changing the responsible official from Mark Allen to Jo Janssen, Site Leader. 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 F**  
 Hazardous Air Pollutants (HAP) Emissions Log

*This record keeping sheet or something similar may be used to demonstrate compliance with PW002.*

Month / Year	Equipment Name / (EP/EU ID)	Material Used (Name/Type)	Amount Used (Units)	HAP1 [Name] Emissions	HAP2 [Name] Emissions	HAP2 [Name] Emissions	HAP2 [Name] Emissions	HAP2 [Name] Emissions	Total HAP Emissions
				(tons) <sup>1,2</sup>					
			Monthly Total:						
			12-Month Rolling Total: <sup>2</sup>						
			Monthly Total:						
			12-Month Rolling Total: <sup>2</sup>						

<sup>1</sup> All facility HAP emissions, including fugitive emissions and any bypass exhaust emissions must be counted in the totals. HAP emissions include the applicable control efficiency for any operating control devices.

<sup>2</sup> A 12-Month Rolling total of less than 10 tons of any individual HAP and less than 25 tons total HAP indicates compliance..

**DUPLICATE THIS FORM AS NEEDED**

## 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 June 7, 2005; supplemental information received December 16, 2009, and January 14, 2010;
- 2) 2006 Emissions Inventory Questionnaire, received February 13, 2007; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
- 4) Missouri Department of Natural Resources Construction Permit #0198-109, Issued December 24, 1997
- 5) Missouri Department of Natural Resources Construction Permit #122002-001, Issued November 18, 2002
- 6) Missouri Department of Natural Resources Construction Permit #022004-008A
- 7) Compliance Assurance Monitoring (CAM) Plan

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

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

10 CSR 10-6.165, *Restriction of Emission of Odors* and PW003

Construction Permits #0198-109 and #122002-001 contain special permit conditions that require the installation to develop and implement a corrective active plan if a continuing situation of nuisance odors exists in violation of 10 CSR 10-6.165 and the Director determines such a plan to be necessary. The previous operating permit did not include these conditions because 10 CSR 10-6.165 was a Core Permit Requirement. Since the development and implementation of a corrective action plan is not required for this type of installation by 10 CSR 10-6.165, it was determined that a plantwide operating condition, PW003, was necessary in order to incorporate the requirements of these construction permits.

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

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

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

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

These rules were determined to be not applicable because there is no indication that the installation is currently handling asbestos. As per a letter dated September 11, 2000, and signed by Mr. David G. Ellison, Engineering Manager, the installation was constructed in 1998, with no asbestos-containing materials. See the further discussion under “National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability” of this Statement of Basis.

10 CSR 10-6.100, *Alternate Emission Limits*

This rule is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

This rule was determined not to be applicable to the installation. All combustion equipment is limited to burning pipeline grade natural gas. Per 10 CSR 10-6.260(1)(A)2, this rule is not applicable to combustion equipment that uses exclusively pipeline grade natural gas. The installation has no other apparent sources of sulfur compound emissions.

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

This rule was determined not to apply to the drying systems at the installation because they are direct heating sources.

**Construction Permit Revisions**

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

- 1) Missouri Department of Natural Resources Construction Permit #0198-109, Issued December 24, 1997.
  - a) Special Permit Condition 3 specified that the VOC capture rate for the total enclosure of the adhesive laminator (EP-3, EU0020) be verified using “Procedure T – *Criteria for and Verification of a Permanent or Temporary Total Enclosure*”. This refers to 40 CFR 52.741, Appendix B. The requirement was changed to refer to the procedures referenced in US EPA Method 204 in permit condition EU0020-001.
  - b) Construction permit #022004-008, issued December 30, 2003, is for a 3<sup>rd</sup> deck to the tandem extrusion laminator. Since the new unit has separate permit conditions, the description of tandem extrusion laminator was modified to “Tandem Extrusion Laminator [decks one and two]” in EU0013 and permit condition EU0013-001.
- 2) Missouri Department of Natural Resources Construction Permit #032002-20, Issued March 4, 2002. The equipment described in this permit was never installed and is no longer at the installation. Therefore, no permit requirements were included for this construction permit in this operating permit.
- 3) Missouri Department of Natural Resources Construction Permit Exemption Letter dated April 24, 2007 for the installation of organic liquid storage tanks and ozone treating systems. These units are listed under “Emission Units Without Limitations.”
- 4) Missouri Department of Natural Resources Construction Permit Exemption Letter dated April 5, 2010 for the installation of the laser perforation system. This unit is listed under “Emission Units Without Limitations.”
- 5) Missouri Department of Natural Resources Construction Permit 022004-008A, (being issued at the same time as this operating permit renewal). This permit was issued in response to a request by the permittee to remove existing 40 ton per year volatile organic compound (VOC) limits in permits 122002-001, 022003-020, and 022004-008. These individual 40 ton VOC limits were incorporated into one plan wide 250 ton per year VOC limit. Therefore Special Condition 1 of permits 0198-019,

122002-001, and 022003-020, and Special Conditions 1, 2 and 3 of permit 022004-008 were not included in this operating permit.

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

40 CFR Part 60 Subpart QQ, *Standards of Performance for the Graphic Arts Industry: Publication Rotogravure Printing*

This rule was determined to be not applicable since the facility does not operate publication rotogravure printing presses.

40 CFR Part 60 Subpart RR, *Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations*

This rule was determined to be not applicable since the facility does not operate coating lines used in the manufacture of pressure sensitive tape and label materials

40 CFR Part 60 Subpart FFF, *Standards of Performance for Flexible Vinyl and Urethane Coating and Printing*

This rule was determined to be not applicable since the facility does not operate rotogravure printing lines which are used to print or coat flexible vinyl or urethane products.

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

40 CFR Part 63 Subpart KK, *National Emission Standards for the Printing and Publishing Industry*

This rule is applicable to sources at which publication rotogravure, product and packaging rotogravure, or wide-web flexographic printing presses are operated who are a major source of hazardous air pollutants (HAP) or who meet the criteria for establishing the facility to be an area source of HAP with respect to the rule.

The installation began operation in 1998. Although the installation did not declare area source status before the initial compliance date for Subpart KK of May 30, 1999, HAP emissions never exceeded the major source threshold. As a part of their initial operating permit OP2000137, issued December 12, 2000, the installation accepted federally enforceable permit limits to restrict HAP emissions from the entire facility to less than ten tons of any individual HAP and less than 25 tons total HAP in any consecutive 12-month period. Because of these voluntary limits, the facility was considered to be an area source and therefore subject only to the record keeping provisions of §63.829(d) and the initial notification provisions of §63.830(b)(1) of the rule.

During the EPA review process of issuing this renewal of OP2000137, it was determined that the facility did not request the 10/25 HAP limits before the initial compliance date of Subpart KK had lapsed and therefore should not have been granted area source status. Although actual emissions of HAPs never exceeded the major source threshold, it is potential emissions, not actual emissions that are considered when determining MACT applicability. Because of these reasons, Subpart KK is being applied to the facility in this renewal permit and will apply in all future permits under the “Once-In-Always-In” policy.

Pursuant to the provisions of 40 CFR 63.821(a)(3), Milprint has opted to include EU0013 Tandem Extrusion Laminator JE-1 (decks 1 and 2); EU0014 Extrusion Coater Laminator JE-2; EU0015 JE-1 (deck 3); and EU0020 Adhesive Laminator JA-1 in the applicability of Subpart KK. This renders the provisions of 40 CFR 63, Subpart JJJJ (Paper and Other Web Coating) not applicable for those units.

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

In the permit application and according to Air Pollution Control Program records, there was no indication that any Missouri Air Conservation Law, Asbestos Abatement, 643.225 through 643.250; 10 CSR 10-6.080, Emission Standards for Hazardous Air Pollutants, Subpart M, National Standards for Asbestos; and 10 CSR 10-6.250, Asbestos Abatement Projects - Certification, Accreditation, and Business Exemption Requirements apply to this installation. The installation is subject to these regulations if they undertake any projects that deal with or involve any asbestos containing materials. None of the installation's operating projects underway at the time of this review deal with or involve asbestos containing material. Therefore, the above regulations were not cited in the operating permit. If the installation should undertake any construction or demolition projects in the future that deal with or involve any asbestos containing materials, the installation must follow all of the applicable requirements of the above rules related to that specific project.

### **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 was determined to be applicable to the EU0010, EU0010, EU0011, EU0012, EU0013, EU0014, and EU0020 flexographic printers, rotogravure printers, extrusion laminators and adhesive laminator because these units use control devices to maintain VOC emissions below the PSD major source threshold of 250 tons per year. Emissions from these units are controlled by the series of three catalytic thermal oxidizers listed as EU0030.

EU0010, EU0010, EU0011, EU0012, EU0013, EU0014, and EU0020 are required to be vented to the oxidizer system and the oxidizer system is required to be operational whenever these units are in use. Permit conditions EU0010-001, EU0011-001, EU0012-001, EU0013-001, and EU0014-001 reference the Compliance Assurance Monitoring Approach for the capture system for unenclosed processes connected to the oxidizer system. Permit condition EU0020-001 references the Compliance Assurance Monitoring Approach for the capture system for the permanent total enclosure surrounding this unit. Permit condition EU0030-001 contains all of the maintenance and monitoring requirements for the oxidizers and the Compliance Assurance Monitoring Plan for the oxidizer system.

### **Other Regulatory Determinations**

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

This rule is now included as a Core Permit Requirement. The installation is located in the outstate Missouri area and would be subject to the following visible emission limits:

*For existing sources, visible emissions may not exceed an opacity of 40 percent. For new sources, visible emissions may not exceed an opacity of 20 percent. The allowable exception is that visible emissions with an opacity of up to 60 percent may be discharged for a period(s) aggregating not more than six (6) minutes in any 60 minutes.*

All emission units at the installation are considered to be new sources since they were installed after February 24, 1971. Monitoring is not expected to be required to achieve compliance with this Core Permit Requirement for the following reasons:

- The majority of the emission units emit only volatile organic compounds (VOC). These VOC emissions are not in a form to be considered to be visible air contaminants.
- The EU0030 catalytic oxidizer system and the EU0040 indirect heating sources may emit combustion byproducts. However, these sources combust natural gas only and it is unlikely that emissions would exceed the relevant opacity limits for new sources.
- The EU0013 tandem coextrusion laminators have the potential to emit small amounts of particulate matter. The concentration of particulate matter in the exhaust was previously calculated to be less than 0.0058 grains per cubic foot of exhaust. The reviewer determined that this would be unlikely to exceed the relevant opacity limits for new sources.
- The corona treaters have the potential to emit ozone which is not in a form to be considered to be a visible air contaminant.

Therefore, no plantwide or emission-unit monitoring requirements were included in this operating permit.

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

This rule restricts the emission of particulate matter from an industrial process based on the maximum design capacity of that process. The rule was determined not to be applicable to the installation since 10 CSR 10-6.400 exempts emission units that at maximum design capacity have a potential to emit less than one-half (0.5) pounds per hour of particulate matter.

The EU0013 tandem coextrusion laminators at the installation were determined to be exempt based on the following calculations:

- The maximum hourly process rate was listed as 1,500 pounds per hour (0.75 tons per hour) in the application for Construction Permit #0198-109.
- Using an emission factor of 0.26 pounds PM / ton processed from the application, the maximum potential emissions rate was calculated to be  $(0.26) \times (0.75) = 0.20$  pounds per hour.

No other emission units were determined to be subject to this rule.

#### Emission Units Without Limitations

The following units were listed as insignificant emission sources in the application and no emission unit specific permit requirements were determined to be applicable. VOC and HAP emissions from these sources are subject to the emission limits in PW001 and PW002. These sources are also subject to the requirements of PW003 and PW004. In the event that the installation exceeds the HAP limits in PW002 and is required to comply with the full requirements of 40 CFR Part 63 Subpart KK, these sources would need to be reviewed again to determine whether emission-unit specific permit conditions would become required.

- EU0100, Solventless Adhesive Laminator (JA-2)
- EU0110, Parts Washer Operations and Solvent Storage
- EU0120, Solvent Recovery Still for Parts Washers
- EU0130, Corona Treaters
- EU0140, Resin Pellet Storage Silos
- EU0150, Raw Material Storage and Mixing Rooms
- EU0160, Waste Storage and Mixing Areas
- Tank Farm
- Ozonator of JE-1
- Laser Perforation Unit
- Die Exhaust
- Trim Chopper/Compaction Systems
- Miscellaneous Natural Gas Combustion: 16 Heating Units with an aggregate 36.5 MM Btu/hr capacity

**Facility Potential to Emit:**

An updated Controlled Potential to Emit for this facility is shown below:

Pollutant	
CO	26.45
CO <sub>2e</sub>	621.36
NO <sub>x</sub>	31.49
PM <sub>10</sub>	2.39
PM <sub>2.5</sub>	2.39
SO <sub>x</sub>	0.09
VOC	2,482
HAP	0

<sup>1</sup>This PTE is based upon 8760 annual hours of uncontrolled operation unless otherwise stated. Emission Units EU0010, EU0011, EU0012, EU0013, EU0014 and EU0015 were evaluated with control efficiency of 85.5 percent and EU0160 were evaluated with VOC control efficiency of 89.5 percent because they are required to maintain proper operation of the catalytic thermal oxidizer system at all times the units are in operation. Plant wide condition PW001 limits VOC emissions to under 250 tons per year and plant wide condition PW002 limits HAP emissions to 10 tons per year for each individual HAP and/or 25 tons total for all HAPs.

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

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

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

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

Prepared by:

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Jill Wade, P.E.  
Environmental Engineer

CERTIFIED MAIL: 70093410000190189244  
RETURN RECEIPT REQUESTED

Ms. Jennifer Janssen  
Milprint Packaging, LLC – A Bemis Company  
3210 North Progress Street  
Joplin, MO 64801

Re: Milprint Packaging, LLC – A Bemis Company, 097-0132  
Permit Number: **OP2011-053**

Dear Ms. Janssen:

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 Jill Wade, P.E. , 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:jwk

Enclosures

c: Southwest Regional Office  
PAMS File: 2005-06-037