



Missouri Department of Natural Resources
Air Pollution Control Program

INTERMEDIATE STATE 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 here in.

Intermediate Operating Permit Number: OP2010-056
Expiration Date: JUN 17 2015
Installation ID: 077-0047
Project Number: 2005-03-075

Installation Name and Address

Missouri State University
901 S. National Ave.
Springfield, MO 65897
Greene County

Parent Company's Name and Address

Missouri State University
901 S. National Ave.
Springfield, MO 65897

Installation Description:

Missouri State University (MSU) is an educational institution. The power house is used to generate steam for heating and air conditioning in various campus buildings and dormitories. The power house has three large boilers that are natural gas fired with #2 fuel oil used as standby fuel. Several individual housing units and classroom buildings also have small boilers and hot water units as well. They are all natural gas fired only and all are less than 10 million BTU/hr in size with several below 1 million BTU/hr.

JUN 18 2010

Effective Date

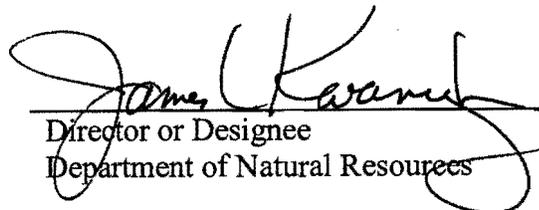

Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Missouri State University (MSU) is an educational institution. The power house is used to generate steam for heating and air conditioning in various campus buildings and dormitories. The power house has three large boilers that are natural gas fired with #2 fuel oil used as standby fuel. Several individual housing units and classroom buildings also have small boilers and hot water units as well. They are all natural gas fired only and all are less than 10 million BTU/hr in size with several below 1 million BTU/hr.

Reported Air Pollutant Emissions, tons per year							
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compounds (VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)
2008	0.65	7.23	8.22	0.41	6.14	0	0
2007	0.58	0.05	7.68	0.42	6.45	0	0
2006	0.55	0.47	7.35	0.41	6.14	0	0
2005	0.83	0.47	10.88	0.60	9.09	0	0
2004	0.96	0.08	12.69	0.70	10.65	0	0

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit
EU0180	Power House (POWR) BLR-2 (EP-18)
EU0190	Power House (POWR) BLR-3 (EP-19)
EU0200	Power House (POWR) BLR-4 (EP-20)

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance.

Insignificant Emission Units

Morris Center (MCCE) Boiler #1 (EP-01), 2.232 MMBtu/hr
 Morris Center (MCCE) Boiler #2 (EP-02), 2.232 MMBtu/hr
 Glass Hall (GLAS) Building Boiler (EP-03), 4/3 MMBtu/hr
 Glass Hall (GLAS) Domestic Hot Water (EP-04), 0.665 MMBtu/hr
 Kings Street Annex (KGSX) 1st Floor Hot Water Boiler (EP-05), 1.05 MMBtu/hr
 Kings Street Annex (KGSX) 3rd Floor New Boiler (EP-06), 1.8 MMBtu/hr
 Kings Street Annex (KGSX) Hot Water Boiler (EP-07), 0.12 MMBtu/hr
 Professional Building (PROF) East Boiler (EP-08), 1.749 MMBtu/hr
 Professional Building (PROF) West Boiler (EP-09), 2.1 MMBtu/hr
 Professional Building (PROF) AJAX Boiler New (EP-10), 6 MMBtu/hr
 JQ Hammons Arena (JQHA) Boiler #3 (EP-11), 4 MMBtu/hr

JQ Hammons Arena (JQHA) Boiler #4 (EP-12), 4 MMBtu/hr
Hammons Hall for Performing Arts (HHPA) Fire Tube Boiler (EP-13), 1.35 MMBtu/hr
Hammons Hall for Performing Arts (HHPA) Fire Tube Boiler (EP-14), 1.35 MMBtu/hr
Hammons Hall for Performing Arts (HHPA) Water Heater (EP-15), 0.25 MMBtu/hr
Hammons Student Center (HAMC) East Boiler Bldg Heat #1 (EP-16), 8.369 MMBtu/hr
Hammons Student Center (HAMC) West Boiler Bldg Heat #2 (EP-17), 8.369 MMBtu/hr
University Hall (UNVH) Hot Water Boiler (EP-21), 0.55 MMBtu/hr
Kentwood Hall (KENT) Hot Water Boiler #1 (EP-22), 1.63 MMBtu/hr
Kentwood Hall (KENT) Hot Water Boiler #2 (EP-23), 1.63 MMBtu/hr
Kentwood South (KENT SOUTH) Boiler #1 (EP-24), 0.4 MMBtu/hr
Kentwood South (KENT SOUTH) Boiler #2 (EP-25), 0.4 MMBtu/hr
Sunvilla Tower (SUNV) Boiler #1 (EP-26) 0.7 MMBtu/hr
Sunvilla Tower (SUNV) Boiler #2 (EP-27), 0.7 MMBtu/hr
Sunvilla Tower (SUNV) Domestic W/H Boiler #1 (EP-28), 2/4 MMBtu/hr
Sunvilla Tower (SUNV) Domestic W/H Boiler #2 (EP-29), 2.4 MMBtu/hr
Hammons House (HAMH) Domestic Water Heater #1 (EP-30), 0.6 MMBtu/hr
Hammons House (HAMH) Domestic Water Heater #2 (EP-31), 0.6 MMBtu/hr
Hammons House (HAMH) Domestic Water Heater #3 (EP-32), 0.6 MMBtu/hr
Hammons House (HAMH) Boiler #1 (EP-33), 2 MMBtu/hr
Hammons House (HAMH) Boiler #2 (EP-34), 2 MMBtu/hr
Hutchens House (HUTC) Boiler #1 (EP-35), 2.1 MMBtu/hr
Hutchens House (HUTC) Boiler #2 (EP-36), 2.1 MMBtu/hr
Hutchens House (HUTC) Domestic Water Heater #1 (EP-37), 1.5 MMBtu/hr
Hutchens House (HUTC) Domestic Water Heater #2 (EP-38), 1.5 MMBtu/hr
Garst Dining (GRST) Boiler #1 (EP-39), 0.81 MMBtu/hr
Garst Dining (GRST) Boiler #2 (EP-40), 0.81 MMBtu/hr
Garst Dining (GRST) Domestic Water Heater #1 (EP-41), 1 MMBtu/hr

DOCUMENTS INCORPORATED BY REFERENCE

This permit incorporates the following documents by reference:

None.

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 on the date of permit issuance.

PERMIT CONDITION PW001

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

Operational Limitation:

The permittee shall not emit more than 100 tons of SO_x in any consecutive 12-month period.

Monitoring/Recordkeeping:

1. The permittee shall maintain an accurate record of monthly usage for fuel oil.
2. The annual emissions of SO_x from the usage of fuel oil shall be calculated, Attachment A or an equivalent form generated by the permittee may be used.
3. The permittee shall calculate the annual emissions of SO_x by summing the monthly usage of fuel oil for the last twelve months and multiplying by the emission factor for fuel oil.
4. All records shall be kept for five years and be made available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used at the installation.

Reporting:

1. The permittee shall report to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102, as well as the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after any exceedance of the operational limitation of this permit condition.
2. The permittee shall report any deviations from the requirements of this permit condition in the semi-annual monitoring report and compliance certification required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

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

EU0180, EU0190, and EU0200 - BOILERS		
Emission Unit	Description	Construction Date
EU0180	Power House (POWR) BLR-2, 30 MMBtu/hr	1958
EU0190	Power House (POWR) BLR-3, 54 MMBtu/hr	1965
EU0200	Power House (POWR) BLR-4, 54 MMBtu/hr	1989

PERMIT CONDITION (EU0180, EU0190, and EU0200) - 001

10 CSR 10-4.040 Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating
Code of Ordinances of the City of Springfield, Part II, Chapter 6 Article III, Division 3 (Sections 6.231 through 6.237) Particulate Matter from Fuel Burning Equipment

Emission Limitation:

The permittee shall not emit particulate matter in excess of 0.35 pounds per million BTU of heat input for existing emission units or 0.21 pounds per million BTU of heat input for new emission units.

Equipment Specification/Operational Limitation:

The above referenced units shall be limited to burning pipeline grade natural gas as the primary fuel source and #2 fuel oil as a backup fuel source.

Monitoring/Recordkeeping:

- 1) The permittee shall maintain on the premises of the installation calculations demonstrating compliance with this rule (See Attachment B).
- 2) The calculation shall be made available immediately for inspection to the Department of Natural Resources' or Springfield Air Pollution Control Authority personnel upon request.

Reporting:

Reports of any deviations from the requirements of this permit condition shall be submitted in the annual compliance certification, as required by Section V of this permit.

PERMIT CONDITION (EU0180, EU0190 and EU0200) – 002

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants
Code of Ordinances of the City of Springfield, Part II, Chapter 6 Article III, Division 2 (Sections 6.211 through 6.213) Visible Air Contaminants from Equipment

Emission Limitation:

1. No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any **existing** source any visible emissions with an opacity greater than 40%.

Existing source-any equipment, machine, device, article, contrivance or installation installed or in construction in the outstate Missouri area on February 24, 1971 or in the Springfield metropolitan area on September 24, 1971.

Exception: If the source is altered, repaired, or rebuilt at a cost of fifty percent (50%) or more of its replacement cost exclusive of routine maintenance, it shall no longer be existing, but shall be considered new as defined in this regulation.

2. Exception: A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 60 percent.

Monitoring:

1. The permittee shall conduct opacity readings on this emission unit using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2. The following monitoring schedule must be maintained:
 - a) Weekly observations shall be conducted for a minimum of eight consecutive weeks after permit issuance. Should no violation of this regulation be observed during this period then-
 - b) Observations must be made once every two (2) weeks for a period of eight weeks. If a violation is noted, monitoring reverts to weekly. Should no violation of this regulation be observed during this period then-
 - c) Observations must be made once per month. If a violation is noted, monitoring reverts to weekly.
3. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Record Keeping:

1. The permittee shall maintain records of all observation results (see Attachment C1 or C2, noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
2. The permittee shall maintain records of any equipment malfunctions. (see Attachment D).
3. The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (see Attachment E).
4. Attachments C1, C2, D, and E contain logs including these record keeping requirements. These logs, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
5. These records shall be made available immediately for inspection to Department of Natural Resources' personnel upon request.
6. All records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program’s Enforcement Section, P. O. Box 176, Jefferson City, MO 65102, as well as the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after the permittee determines that an emission unit exceeded the opacity limit.
- 2) The permittee shall report any deviations from the requirements of this permit condition in the annual compliance certification required by Section V of this permit.

PERMIT CONDITION (EU0180, EU0190 & EU0200) - 003
10 CSR 10-6.260 Restriction of Emission of Sulfur Compounds

Emission Limitation:

- 1) Emissions from any new source operation shall not contain more than five hundred parts per million by volume (500 ppmv) of sulfur dioxide. Emissions from any existing source operation shall not contain more than two thousand parts per million by volume (2000 ppmv) of sulfur dioxide.
- 2) Stack gasses shall not contain more than thirty-five milligrams (35 mg) per cubic meter of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive three hour time period.
- 3) No owner or other person shall cause or permit the emission of sulfur compounds from any source which causes or contributes to concentrations exceeding those specified in 10 CSR 10-6.010 Ambient Air Quality Standards, as found in the following table.

Pollutant	Concentration by Volume	Remarks
Sulfur Dioxide (SO ₂)	0.03 parts per million (ppm) (80 micrograms per cubic meter (µg/m ³))	Annual arithmetic mean
	0.14 ppm (365 µg/m ³)	24-hour average not to be exceeded more than once per year
	0.5 ppm (1300 µg/m ³)	3-hour average not to be exceeded more than once per year
Hydrogen Sulfide (H ₂ S)	0.05 ppm (70 µg/m ³)	½-hour average not to be exceeded over 2 times per year
	0.03 ppm (42 µg/m ³)	½-hour average not to be exceeded over 2 times in any 5 consecutive days
Sulfuric Acid (H ₂ SO ₄)	10 µg/m ³	24-hour average not to be exceeded more than once in any 90 consecutive days

Monitoring:

- 1) The permittee shall maintain an accurate record of the sulfur content of fuel used. The installation shall maintain records of the amount of fuel oil burned and verify the sulfur content to be less than 0.5% by weight. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type as a grade level with sulfur content less than 0.5% by weight will be acceptable.

- 2) If the requirements of condition 1 cannot be met, then compliance to the emission limitations shall be determined by source testing. The heating value of the fuel shall be determined as specified in 10 CSR 10-6.040(2). Source testing to determine compliance shall be performed as specified in 10 CSR 10-6.030(6). The actual heat input shall be determined by multiplying the heating value of the fuel by the amount of fuel burned during the source test period.
- 3) Other methods approved by the permitting agency in advance may be used to verify compliance.

Recordkeeping:

- 1) If monitoring option 1 is used to verify compliance, then the permittee shall maintain records on the premises of the analysis of all fuel used which shows weight percentage of sulfur in the fuel. Fuel purchase receipts, analyzed samples or certifications that verify the fuel type and sulfur content will be acceptable.
- 2) If monitoring option 2 is used to verify compliance, then the permittee shall maintain records on the premises of all source testing performed.
- 3) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon request.
- 4) All records shall be maintained for five years.

Reporting:

- 1) The permittee shall report to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102, as well as the Springfield Air Pollution Control Authority, 227 East Chestnut Expressway, Springfield, MO 65802, no later than ten days after any exceedance of the emission limits or sulfur content limit established by this permit condition.
- 2) Reports of any deviations from the requirements of this permit condition shall be submitted in the annual compliance certification, as required by Section V of this permit.

IV. Core Permit Requirements

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

Springfield City Code Article IX Breakdown of Equipment

This requirement is not federally or state enforceable.

In the event that emissions as a direct result of upset conditions or breakdown exceed any of the established limits, the permittee shall advise the city of Springfield Director of Health of such a breakdown and outline a corrective program acceptable to the Director.

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.

Springfield City Code Article II, Division 2, Section 6-51 City or State Permit 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(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(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, §(5)(C)(1) and §(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) in accordance with the requirements outlined in this rule.
- 2) 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.
- 3) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the Emissions Inventory Questionnaire (EIQ) form or equivalent approved by the Director.

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

- 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 10-6.045 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) Yard waste, with the following exceptions:
 1. 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) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- (4) Missouri State University 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 Missouri State University fails to comply with the provisions or any condition of the open burning permit.
 - (A) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- (5) Reporting and 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.
- (6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971 is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

10 CSR 10-4.070 Restriction on 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.

Springfield City Code Article VI Control of Odors in the Ambient Air

This requirement is not federally enforceable.

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

- 1) Residential, recreational, institutional, retail sales, hotel or educational premises.

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

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

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.

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

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the Director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

10 CSR 10-6.065, §(5)(C)1 and §(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, §(5)(C)1 and §(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) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than 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.
 - 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 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 annual 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 §(5)(C)1 and §(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(5)(C)1.A 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 under this rule.

- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) 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 the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances 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, §(5)(C)1 and §(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(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. 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 a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - 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 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; and
 - 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.

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

The application utilized in the preparation of this permit was signed by Charles L. Kroeger. The Air Pollution Control Program was informed that David Vaughan is now the responsible official. 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 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) 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,
- 2) 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,
- 3) 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 §(5)(E)1.A and §(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 A
Fuel Burned Compliance Worksheet

Missouri State University
Permit Number OP2010-056

This sheet covers the period of _____.
(month/year)

Copy this sheet as needed.

Total Fuel Oil Burned for this Month	(Note 1)	
12-Month Total Fuel Oil Burned From Previous Month's Worksheet	(Note 2)	
Monthly Total Fuel Oil Burned From Previous Year's Worksheet	(Note 3)	
Current 12-Month Fuel Oil Burned	(Note 4)	
Current 12-Month total Sox emissions from the burning of fuel oil	(Note 5)	

Note 1: Total gallons of #2 fuel oil burned for the given month.

Note 2: Running 12-month total of fuel oil gallons burned from previous month's worksheet.

Note 3: Fuel oil gallons burned reported for this month in the last calendar year.

Note 4: Amount reported in Note 2 minus amount reported in Note 3 plus amount reported in Note 1. Less than 1.3 million gallons indicates compliance.

Note 5: Total Sox emissions from burning of fuel oil (tons) = amount of fuel oil burned (Mgal) x emission factor for fuel oil (lb/Mgal) / 2000. Must be less than 100 tons to be in compliance with plant-wide permit condition PW001.

ATTACHMENT B
Compliance Calculations for 10 CSR 10-4.040

The total installation heat input (Q) = 214.4 MMBtu/hr

Emission Limitations (Existing Sources):

$$E = 0.90 * (Q)^{-0.174}$$
$$= 0.35 \text{ lb PM}_{10} / \text{MMBtu}$$

Emission Limitations (New Sources):

$$E = 1.31(Q)^{-.338}$$
$$= 0.21 \text{ lb PM}_{10} / \text{MMBtu}$$

All of the applicable emission units combust natural gas or a combination of natural gas as a primary fuel and #2 fuel oil as a backup fuel. Per AP-42 Table 1.4-2 the PM emission factor for combusting natural gas is 7.6 lb/mmcf. Per AP-42 Table 1.3-1 the PM emission factor for combusting #2 fuel oil is 2 lb/10³ gallons. Per Appendix A of AP-42, the heating values of natural gas and propane are 1050 MMBtu/mmcf and 5.9x10⁶ BTU/bbl respectively. Therefore, the potential emission rates for the applicable units listed above are:

$$\text{Emission Rate (Natural Gas)} = 7.6 \text{ lb PM/mmcf} * 1 \text{ mmcf}/1050 \text{ MMBtu} = 0.007 \text{ lb PM/MMBtu}$$

$$\text{Emission Rate (No. 2 Fuel Oil)} = 2 \text{ lb PM}/10^3 \text{ gallons} * 1 \text{ bbl}/5.9 \times 10^6 \text{ Btu} * 31.5 \text{ gallons}/1 \text{ bbl} * 1 \times 10^6 \text{ Btu}/1 \text{ MMBtu} = 0.011 \text{ lb PM/MMBtu}$$

Since 0.007 and 0.011 < 0.21 and 0.35, the units will always be in compliance.

Attachment E

Method 9 Opacity Emission Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Min.	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ % opacity.

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

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

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) Intermediate Operating Permit Application, received March 10, 2005;
- 2) 2007 Emissions Inventory Questionnaire, received April 7, 2008; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

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

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

None.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100, *Alternate Emission Limits*

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

Construction Permit Revisions

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

None.

New Source Performance Standards (NSPS) Applicability

40 CFR Part 60 Subpart Dc, *Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units* does not apply to Boiler #4 (EU0200) because it was manufactured prior to June 9, 1989.

Maximum Available Control Technology (MACT) Applicability

None.

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.

No other NESHAP regulations apply to this facility.

Other Regulatory Determinations

10 CSR 10-4.040 *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating*

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

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

These regulations are only applicable to emission units EU0180, EU0190, and EU0200 because they combust No. 2 fuel oil as a backup fuel.

The list of emission units without limitations includes many natural gas burning boilers that are less than 10 MMBtu/hr. 10 CSR 10-6.020 (2) defines an insignificant source as a unit or activity listed in 10 CSR 10-6.061 as exempt or excluded from construction permit review under 10 CSR 10-6.060. Combustion equipment that uses exclusively natural gas or liquefied petroleum gas with a capacity of less than 10 MMBtu/hour is listed as an exempt unit therefore these units are not included with the emission limits with limitations.

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:

Jill Wade, P.E.
Environmental Engineer