

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 herein.

Intermediate Operating Permit Number: OP2017-059

Expiration Date: JUL 24 2022

Installation ID: 510-1761

Project Number: 2006-05-064

Installation Name and Address

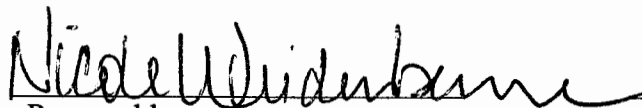
Nestle Purina PetCare Company
901 Chouteau Avenue
St. Louis, MO 63164
City of St. Louis County

Parent Company's Name and Address

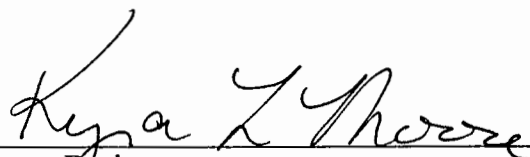
Nestle Purina PetCare Company
901 Chouteau Avenue
St. Louis, MO 63164

Installation Description:

Nestle Purina PetCare Company has its corporate headquarters complex located in St. Louis, Missouri. The complex includes office buildings, research laboratories and pilot plants for experimental pet food and pet litter production processes. Emissions sources include dual fuel fired boilers, emergency and peak shaving generators, pet food research operations, and a small print shop. The installation has requested a voluntary limit on NO_x emissions in order to qualify for this Intermediate Operating Permit.



Prepared by:
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Operating Permit Unit



Director or Designee
Department of Natural Resources

JUL 24 2017

Effective Date

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I. Installation Equipment Listing

EMISSION UNITS WITH SPECIFIC 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 units listed here are subject to plant wide conditions.

EQ #	Description
EP-1	Boiler #1
EP-14	Boiler #2
EP-15	Boiler #3
Insig-4	GP Research Dryer
Insig-4	Pet food Research Dryer
Insig-4	Pet food Research Spray Dryer
Insig-4	Pet food Research Niro Pilot Spray Dryer
Insig-4	Pet food Research Aeroglide Dryer
	Pet food Research Buhler Separator
	Pet food Research Batching bins and mixing, controlled by Dust Collector
Insig-5	Pet food Research Pneumatic Transfer
EP-8	Parts Washer
EP-9	Proclean Dry Filter Paint Booth
Insig-6	2-20,000 gallon underground storage tank, #2 fuel oil for boilers and emergency generators, installed 1991
Insig-6	1,000 gallon capacity diesel fuel storage tank for "E" Building Emergency Generator
Insig-6	1,000 gallon capacity diesel fuel storage tank for "C" building emergency generator
Insig-6	1,600 gallon capacity diesel fuel storage tank for Research North Building Emergency generator engine
Insig-6	1,000 gallon capacity diesel fuel storage tank associated with EP-7
EP-7	"E" Building emergency generator
EP-5	"Tower" Building emergency generator
EP-10	"A" Building emergency generator
EP-11	EDP Building emergency generator
Insig-9	Research North Building emergency generator
Insig-11	"C" Research Building emergency generator
EP-12	"C" Building peak shaving generator
Insig-10	Zappi emergency fire pump engine

EMISSION UNITS WITHOUT SPECIFIC LIMITATIONS

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance. Emission units listed here are subject to plant wide conditions.

EQ #	Description
Insig-1	2 "E" Building boilers, natural gas fired, 1.255 MMBtu/hr each
Insig-2	2 "C" Building boilers, natural gas fired, 1.974 MMBtu/hr each
Insig-3	"C" Building water heater, natural gas fired, 0.14 MMBtu/hr
	"C" Research Building, 2 hot water heaters, natural gas fired, 2.0 MMBtu/hr each
	"C" Research Building steam boiler, natural gas fired, 1.63 MMBtu/hr
Insig-7	EPSON SureColor Printer, installed 2013
Insig-8	Pet food Research thermoforming machine
	Maintenance sandblasting
	Millwrights sandblasting
	Welding and machining operations
	Grain handling and research south

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. The plant wide conditions apply to all emission units at this installation. All emission units are listed in Section I under Emission Units with Limitations and Emission Units without Limitations. The following requirements apply to *all conditions* in this permit, unless otherwise noted.

Monitoring:

The permittee shall calibrate, maintain and operate all pollution control devices and pollution monitoring related instruments according to the manufacturer's recommendations. All calibrations, maintenance, and operations shall occur according to good engineering practices.

Recordkeeping:

1. The permittee shall record all required record keeping in an appropriate format.
2. Records may be kept electronically using database or workbook systems, as long as all required information is readily available for compliance determinations.
3. The permittee shall keep a copy of this operating permit and all issued construction permits on site.
4. All records must be kept for a minimum of 5 years and be made available to department personnel upon request.

Reporting:

1. The permittee shall report any exceedance of any of the terms imposed by this permit, or any malfunction which could cause an exceedance of any of the terms imposed by this permit, no later than ten days after the exceedance or event causing the exceedance (unless otherwise specified in the specific condition).
2. The permittee shall report any deviations from the monitoring, recordkeeping, and reporting requirements of this permit condition in the annual compliance certification.
3. All reports and certifications shall be submitted to the Air Pollution Control Program's Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.

Permit Condition PW1

10 CSR 10-6.020(2)(I)24. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s)

Emission Limitation:

The permittee shall emit less than 100 tons of NO_x in any consecutive 12-month period from the current installation.

Monitoring/Recordkeeping:

The permittee shall calculate and record the installation-wide emissions of NO_x on a monthly and consecutive 12 month basis. The permittee shall use Attachment E, or equivalent, to demonstrate compliance.

Permit Condition PW2

10 CSR 10-6.020(2)(I)24. and 10 CSR 10-6.065(5)(C)2. Voluntary Limitation(s); and
10 CSR10-6.260 Restriction of Emission of Sulfur Compounds; and
10 CSR 10-6.060 Construction Permits Required,
Construction Permit #012012-003, Issued January 9, 2012; and
10 CSR 10-6.070, New Source Performance Regulations
40 CFR part 60 Subpart A, General Provisions; and
40 CFR Part 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional
Steam Generating Units

Emission Limitation:

For all generator engines: The permittee shall not cause or permit the emission into the atmosphere gases containing more than 500 ppmv of sulfur dioxide or more than 35 mg/m³ of sulfuric acid or sulfur trioxide or any combination of those gases averaged on any consecutive 3 hour time period. [6.260(3)(A)2.]

Operational Limitation:

The permittee shall burn #2 fuel oil with a sulfur content less than or equal to 0.0015% by weight or pipeline grade natural gas in all equipment. [6.065(5)(C)2.]

Monitoring/Reporting:

1. For all units: the permittee shall keep fuel supplier certification as specified in 40 CFR part 60 Subpart Dc, section §60.48(f)(1). [6.065(5)(C)2.]
2. For Boilers #2 and #3 (EP 14 and 15): the permittee shall comply with the following reporting conditions for 40 CFR part 60 Subpart Dc: [§60.48c]
 - a. The permittee shall keep records and submit reports as required including the following information, as applicable: [§60.48c(e)]
 - b. Calendar dates covered in the reporting period. [§60.48c(e)(1)]
 - c. If fuel supplier certification is used to demonstrate compliance, records of fuel supplier certification as described under §60.48c(f)(1). [§60.48c(e)(11)]
 - i. Fuel supplier certification for distillate oil shall include the following information: [§60.48c(f)(1)]
 - (1) The name of the oil supplier; and [§60.48c(f)(1)(i)]
 - (2) A statement from the oil supplier that the oil complies with the specifications under the definition of distillate oil in §60.41c. [§60.48c(f)(1)(ii)]
 - (3) The sulfur content or maximum sulfur content of the fuel. [§60.48c(f)(1)(iii)]
 - d. In addition to records of fuel supplier certifications, the report shall include a certified statement signed by the responsible official that the records of fuel supplier certifications submitted represent all of the fuel combusted during the reporting period. [§60.48c(e)(11)]
 - e. Except as provided in §60.48c(g)(2) and (3), the permittee shall record and maintain records of the amounts of each fuel combusted during each day. [§60.48c(g)(1)]
 - f. As an alternative to meeting the requirements of §60.48c(g)(1), the permittee may elect to record and maintain records of the amount of each fuel combusted during each calendar month. [§60.48c(g)(2)]
 - g. As an alternative to meeting the requirements of §60.48c(g)(1), the permittee may elect to record and maintain records of the total amount of each steam generating unit fuel delivered to that property during each calendar month. [§60.48c(g)(3)]

- h. The reporting period for the reports required under subpart Dc is each six-month period. All reports shall be submitted to the program and shall be postmarked by the 30th day following the end of the reporting period. [§60.48c(i)]

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.

Permit Condition 1		
10 CSR 10-6.075, Maximum Achievable Control Regulations 40 CFR part 63, Subpart A, General Provisions; and 40 CFR Part 63, Subpart JJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources; and 10 CSR 10-6.060 Construction Permits Required Construction Permit #012012-003, Issued January 9, 2012		
EIQ #	Description	Manufacturer/Model #
EP-1	Boiler #1, natural gas fired with #2 fuel oil backup, constructed 10/31/1963, MHDR=25.168 MMBtu/hr	Cleaver Brooks
EP-14	Boiler #2, natural gas fired with #2 fuel oil backup, constructed 1/16/2012, MHDR=20.9 MMBtu/hr	Johnston, S/N: PTFX-4LG-150
EP-15	Boiler #3, natural gas fired with #2 fuel oil backup, constructed 1/16/2012, MHDR=20.9 MMBtu/hr	Johnston, S/N: PTFX-4LG-150

Operational Limitations:

1. The permittee shall not exceed a combined total of 48 hours during any calendar year for periodic testing of liquid fuel for each boiler.
2. The permittee shall burn #2 fuel oil in the boilers only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel.

Monitoring/Recordkeeping/Reporting:

1. The permittee shall keep records of the total hours of fuel oil usage per boiler on a monthly and calendar year basis. The permittee shall keep records of the purpose for burning #2 fuel oil. The permittee shall use Attachments F and G, or equivalents, to demonstrate compliance.
2. If the permittee switches fuels or makes a physical change to the boiler and the fuel switch or change results in the applicability of a different subcategory within subpart JJJJJ, in the boiler becoming subject to subpart JJJJJ, or in the boiler switching out of subpart JJJJJ due to a change to 100 percent natural gas, the permittee must provide notice of the date upon which permittee switched fuels, or made the physical change within 30 days of the change. [§63.11225(g)]
 The notification must identify:
 - a. The name of the permittee of the affected source, the location of the source, the boiler(s) that have switched fuels and the date of the notice. [§63.11225(g)(1)]
 - b. The date upon which the fuel switch occurred. [§63.11225(g)(2)]
3. All reports and certifications required by this permit condition shall be submitted to both the Missouri Air Compliance Coordinate at EPA Region 7, 11201 Renner Blvd., Lenexa, KS 66219, and the Air Pollution Control Program’s Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.

Permit Condition 2		
10 CSR 10-6.220, Restriction of Emissions of Visible Air Contaminants		
EIQ #	Description	Manufacturer/Model #
EP-1	Boiler #1, natural gas fired with #2 fuel oil backup, constructed 10/31/1963, MHDR=25.168 MMBtu/hr	Cleaver Brooks
EP-14	Boiler #2, natural gas fired with #2 fuel oil backup, constructed 1/16/2012, MHDR=20.9 MMBtu/hr	Johnston, S/N: PTFX-4LG-150
EP-15	Boiler #3, natural gas fired with #2 fuel oil backup, constructed 1/16/2012, MHDR=20.9 MMBtu/hr	Johnston, S/N: PTFX-4LG-150
Insig-4	GP Research Dryer, natural gas fired, installed 2001, MHDR=2.2 MMBtu/hr; 1 ton/hr clay, controlled by fabric filter	
Insig-4	Pet food Research Dryer, natural gas fired, MHDR= 4 tons/hr	
Insig-4	Pet food Research Spray Dryer, natural gas fired, MHDR=0.25 MMBtu/hr, 4 tons/hr	
Insig-4	Pet food Research Niro Pilot Spray Dryer, installed 2005, MHDR=0.03 ton/hr, controlled by fabric filter	
Insig-4	Pet food Research Aeroglide Dryer, natural gas fired, installed 2010, MHDR=2.3 MMBtu/hr, 2.9 tons/hr	
	Pet food Research Buhler Separator, MHDR=2.9 tons/hr	
	Pet food Research Batching bins and mixing, controlled by Dust Collector, MHDR=4 tons/hr	
Insig-5	Pet food Research Pneumatic Transfer, MHDR=4 tons/hr	
EP-9	Proclean Dry Filter Paint Booth, constructed 1996; controlled by 90% PM ₁₀ efficient filter; MHDR 0.08 gallons/hr, 50% spray transfer efficiency	Mfr: Devilbiss

Emission Limitation:

1. No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions with an opacity greater than 20%. [6.220(3)(A)]
2. Exception for Boiler #1 (EP-1) only: Existing sources in the St. Louis metropolitan area that are not incinerators and emit less than twenty-five (25) lbs./hr of particulate matter shall be limited to forty percent (40%) opacity. [6.220(3)(A)]
3. Exception for all units: 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 sixty (60) minutes air contaminants with an opacity up to 40%. [6.220(3)(B)]

Monitoring:

1. For Boilers #1 through 3 (EP-1, EP-14, and EP-15):
 - a. The permittee shall conduct visible emission observations on each emission unit using the procedures contained in USEPA Test Method 22 or equivalent. The permittee is only required to

make observations when the emission unit is operating on fuel oil and when the weather conditions allow. If the permittee observes no visible emissions using these procedures, then no further observations are required. For emission units with visible emissions, the source representative would then conduct a Method 9 observation.

- b. The permittee must maintain the following monitoring schedule:
 - i. The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - ii. Should the permittee observe no violations of this regulation during this period then-
 - (1) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - (2) If a violation is noted, monitoring reverts to weekly.
 - (3) Should no violation of this regulation be observed during this period then-
 - A. The permittee may observe once per month.
 - B. If a violation is noted, monitoring reverts to weekly.
 - c. If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.
2. For all units except Boilers #1 through #3 (EP-1, EP-14, and EP-15):
- a. None, see Statement of Basis.

Recordkeeping:

- 1. The permittee shall maintain records of all observation results using Attachments B, C, and D (or equivalents), 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;
 - c. Whether the visible emissions were normal for the process;
 - d. The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 2. The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

Permit Condition 3		
10 CSR 10-5.300, Control of Emissions From Solvent Metal Cleaning		
EQ #	Description	Manufacturer/Model #
EP-8	Solvent parts washer, 20 gallon capacity, constructed 11/4/2004	Mfr: Zep, Model: Dyna Clean 9152, S/N: H2003011038

Equipment Specifications:

- 1. The permittee shall not use, sell or offer for sale for use within the City of St. Louis and St. Charles, St. Louis, Jefferson and Franklin Counties a cold cleaning solvent with a vapor pressure greater than 1.0 mmHg (0.019 psi) at 20°C (68°F) unless used for carburetor cleaning. [5.300(3)(A)1.A]
- 2. The permittee shall not use, sell or offer for sale for use within the City of St. Louis and St. Charles, St. Louis, Jefferson and Franklin Counties a cold cleaning solvent for the purpose of carburetor cleaning with a vapor pressure greater than 5.0 mmHg (0.097 psi) at 20°C (68°F). [5.300(3)(A)1.B]
- 3. Each cold cleaner shall have a cover which prevents the escape of solvent vapors from the solvent bath while in the closed position or an enclosed reservoir which limits the escape of solvent vapors from the solvent bath whenever parts are not being processed in the cleaner. [5.300(3)(A)1.C]
- 4. The permittee may use an alternate method for reducing cold cleaning emissions if the permittee shows the level of emission control is equivalent to or greater than the requirements of

- 5.300(3)(A)1.A and (3)(A)1.B. This alternate method shall be approved by the director and EPA. [5.300(3)(A)1.D]
5. When one or more of the following conditions exist, the cover shall be designed to operate easily such that minimal disturbing of the solvent vapors in the tank occurs. (For covers larger than 10 ft², this shall be accomplished by either mechanical assistance such as spring loading or counter weighing or by power systems): [5.300(3)(A)1.E]
 - a. The solvent vapor pressure is greater than 0.3 psi measured at 37.8°C (100°F); [5.300(3)(A)1.E(I)]
 - b. The solvent is agitated; or [5.300(3)(A)1.E(II)]
 - c. The solvent is heated. [5.300(3)(A)1.E(III)]
 6. Each cold cleaner shall have an internal drainage facility so that parts are enclosed under the cover while draining. [5.300(3)(A)1.F]
 7. If an internal drainage facility cannot fit into the cleaning system and the solvent vapor pressure is less than 0.6 psi measured at 37.8°C (100°F), then the cold cleaner shall have an external drainage facility which provides for the solvent to drain back into the solvent bath. [5.300(3)(A)1.G]
 8. Solvent sprays, if used, shall be a solid fluid stream (not a fine, atomized or shower-type spray) and at a pressure which does not cause splashing above or beyond the freeboard. [5.300(3)(A)1.H]
 9. A permanent conspicuous label summarizing the operating procedures shall be affixed to the equipment or in a location readily visible during operation of the equipment. [5.300(3)(A)1.I]
 10. Any cold cleaner which uses a solvent that has a solvent vapor pressure greater than 0.6 psi measured at 37.8°C (100°F) or heated above 48.9°C (120°F) shall use one of the following control devices: [5.300(3)(A)1.J]
 - a. A freeboard ratio of at least 0.75; [5.300(3)(A)1.J(I)]
 - b. Water cover (solvent shall be insoluble in and heavier than water); or [5.300(3)(A)1.J(II)]
 - c. Other control systems with a mass balance demonstrated overall VOC emissions reduction efficiency greater than or equal to 65%. These control systems shall receive approval from the director and EPA prior to their use. [5.300(3)(A)1.J(III)]

Operating Procedure Requirements:

1. Cold cleaner covers shall be closed whenever parts are not being handled in the cleaners or the solvent shall drain into an enclosed reservoir except when performing maintenance or collecting solvent samples. [5.300(3)(B)1.A]
2. Cleaned parts shall be drained in the freeboard area for at least 15 seconds or until dripping ceases, whichever is longer. Parts having cavities or blind holes shall be tipped or rotated while the part is draining. During the draining, tipping or rotating, the parts shall be positioned so that the solvent drains directly back to the cold cleaner. [5.300(3)(B)1.B]
3. Whenever a cold cleaner fails to perform within the operating requirements, the unit shall be shut down immediately and shall remain shut down until operation is restored to meet the operating requirements. [5.300(3)(B)1.C]
4. Solvent leaks shall be repaired immediately or the cold cleaner shall be shut down until the leaks are repaired. [5.300(3)(B)1.D]
5. Any waste material removed from a cold cleaner shall be disposed of by one of the following methods or an equivalent method approved by the director and EPA: [5.300(3)(B)1.E]
 - a. Reduction of the waste material to less than 20% VOC solvent by distillation and proper disposal of the still bottom waste; or [5.300(3)(B)1.E(I)]
 - b. Stored in closed containers for transfer to— [5.300(3)(B)1.E(II)]
 - i. A contract reclamation service; or [5.300(3)(B)1.E(II)(a)]

- ii. A disposal facility approved by the director and EPA. [5.300(3)(B)1.E(II)(b)]
- 6. Waste solvent shall be stored in closed containers only. [5.300(3)(B)1.F]

Operator and Supervisor Training:

- 1. Only persons trained in at least the operational and equipment requirements specified for the solvent metal cleaning process shall be permitted to operate the equipment. [5.300(3)(C)1]
- 2. The person who supervises any person who operates the solvent cleaning equipment shall receive equal or greater operational training than the operator. [5.300(3)(C)2]
- 3. A procedural review shall be given to all solvent metal cleaning equipment operators at least once each 12 months. [5.300(3)(C)3]
- 4. Training records shall be maintained per 5.300(4)(D) and (4)(E). [5.300(3)(C)4]

Recordkeeping and Reporting:

- 1. The permittee shall keep records of all types and amounts of solvents containing waste material from cleaning or degreasing operations transferred either to a contract reclamation service or to a disposal facility and all amounts distilled on the premises. The records also shall include maintenance and repair logs for both the degreaser and any associated control equipment. These records shall be kept current and made available for review on a monthly basis. The director may require additional recordkeeping if necessary to adequately demonstrate compliance. [5.300(4)(A)]
- 2. The permittee shall maintain records which include for each purchase of cold cleaning solvent: [5.300(4)(B)]
 - a. The name and address of the solvent supplier; [5.300(4)(B)1]
 - b. The date of purchase; [5.300(4)(B)2]
 - c. The type of solvent; and [5.300(4)(B)3]
 - d. The vapor pressure of the solvent in mmHg at 20°C (68°F). [5.300(4)(B)4]
- 3. A record shall be kept of solvent metal cleaning training required by 5.300(3)(C). [5.300(4)(D)]
- 4. The permittee shall use Attachment H, or equivalent, to demonstrate compliance.

Permit Condition 4 10 CSR 10-6.060 Construction Permits Required Construction Permit #97-10-098 and amendments issued through March 23, 2017		
EIQ Emission Point	Description	Manufacturer/Model #
EP-7	"E" Building emergency generator, 796.5 HP ICE for 600 kW generator, constructed 1/1/97, combusts #2 fuel oil, with 1,000 gallon capacity #2 fuel oil storage tank	Caterpillar #3412, Generator SR4B
EP-9	Proclean Dry Filter Paint Booth, constructed 1996; controlled by 90% PM ₁₀ efficient filter; MHDR 0.08 gallons/hr, 50% spray transfer efficiency	Mfr: Devilbiss

Emission Limitations:

- 1. The permittee shall emit less than 1.4 tons/year of VOC from the surface coating operations in any 12 consecutive month period. [Special Condition # IIA.]

2. The permittee shall use the emergency generator for less than 500 hours per year. [Special Condition # IIC.]
3. The permittee shall use less than 20,000 gallons of diesel in the emergency generator in any 12 consecutive month period. [Special Condition # IIC.]

Operational Limitations:

1. The permittee shall control paint overspray using a filter with a control efficiency of 90% or better for PM₁₀. [Special Condition # IIIA]
2. Booths equipped with mat/panel filters shall not be operated without a filter in place.
3. The permittee shall affix lids and covers to any VOC containing materials while not active. [Special Condition # IIIB]
4. The permittee shall limit usage of the emergency generator to periods of testing and maintenance or during periods when electrical service is interrupted. [Special Condition # IIIC]
5. The permittee shall use #2 fuel oil in the emergency generator. [Special Condition # IIID]

Monitoring:

For the paint booth:

1. The filters shall be inspected for holes, imperfections, proper installation or other problems that could hinder the effectiveness of the filter.
2. The filters shall be inspected each shift before spraying begins in a booth and after installation of a new filter.
3. The manufacturer's recommendations shall be followed with regard to installation and frequency of replacement of the filters.

Recordkeeping:

1. For the paint booth:
 - a. The permittee shall maintain the following records for the paint booth noting: [Special Condition # IVA.]
 - i. Paint throughput, and
 - ii. Thinner throughput, and
 - iii. VOC and solids content of all paints and thinners.
 - b. The permittee shall maintain records of all raw materials, chemical usage, quantities of final products, and disposal records. [Special Condition # IVD.]
 - c. The permittee shall maintain records of the inspections of mat/panel including when they occur.
2. For the emergency generator:
 - a. The permittee shall maintain the following records for the emergency generator noting: [Special Condition # IVB.]
 - i. Emergency generator usage, and
 - ii. Throughput of diesel, and
 - iii. Hours of operation
3. For the paint booth, the permittee shall use Attachments J and D, or equivalents, to demonstrate compliance with this permit condition.
4. For the emergency generator, the permittee shall use Attachment I or equivalent, to demonstrate compliance with this permit condition.

Permit Condition 5		
10 CSR 10-5.500, Control of Emissions From Volatile Organic Liquid Storage		
EIQ #	Description	Manufacturer/Model #
Insig-6	2-20,000 gallon UST #2 fuel oil for boilers and emergency generators, installed 1991	
Insig-6	1,000 gallon capacity diesel fuel storage tank for "E" Building Emergency Generator	
Insig-6	1,000 gallon capacity diesel fuel storage tank for "C" building emergency generator	
Insig-6	1,600 gallon capacity diesel fuel storage tank for Research North Building Emergency generator engine	
Insig-6	1,000 gallon capacity diesel fuel storage tank associated with EP-7	

Recordkeeping:

Each storage vessel with a design capacity less than 40,000 gallons is subject to no provision of this rule other than those required by maintaining readily accessible records of the dimensions of the storage vessel and analysis of the capacity of the storage vessel. [5.500(4)(F)]

Permit Condition 6		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit #05-08-007 issued September 26, 2005		
EIQ Emission Point	Description	Manufacturer/Model #
EP-10	"A" building emergency generator, 2682.0 HP ICE for 2000 kW generator, Constructed 2005, combusts #2 fuel oil	Caterpillar/ Model DM7085

Operational Limitations:

The permittee shall not use the generator in excess of 1,100 hours per any consecutive 12 month period. [Special Condition #II.A.]

Monitoring/Recordkeeping:

The permittee shall monitor and record the hours of operation for the generator. The permittee shall use Attachment I, or an equivalent, to demonstrate compliance.

Permit Condition 7		
10 CSR 10-6.075 Maximum Achievable Control Technology Regulations 40 CFR Part 63, Subpart ZZZZ – National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines		
EIQ #	Description	Manufacturer/Model #
EP-5	“Tower” Building Emergency Generator, 1676.3 HP internal combustion engine to power 1250 kW generator, engine manufactured 1999. #2 fuel oil fired..	Mfr: Caterpillar (engine), Model # 3512 (engine) SR4B
EP-7	“E” Building Emergency Generator, 796.5 HP internal combustion engine to power 600 kW generator, engine manufactured 1997. #2 fuel oil fired.	Mfr: Caterpillar (engine), Model # 3412 (engine) SR4B (generator), S/N: 81221911 (generator)
EP-10	“A” Building Emergency Generator, 2682 HP internal combustion engine to power 2000 kW generator, engine manufactured 2005. #2 fuel oil fired..	Mfr: Caterpillar (engine), Model DM7085 (engine)
EP-11	EDP Building Emergency Generator, 2682 HP internal combustion engine to power 2000 kW generator, engine manufactured 2005. #2 fuel oil fired	Mfr: Caterpillar (engine); Model DM7085 (engine)

Management Practices:

The permittee shall comply with the requirements in Table 2d to MACT ZZZZ that apply. [§63.6603(a)]

Table 2d to MACT ZZZZ – Requirements for Existing Stationary RICE Located at Area Sources of HAP Emissions

For each...	The permittee shall meet the following requirements...
Emergency stationary CI RICE and black start stationary CI RICE. ¹	a. Change oil and filter every 500 hours of operation or annually, whichever comes first; ²
	b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
	c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

Fuel Requirements:

For existing emergency CI stationary RICE with a site rating of more than 100 brake HP and a displacement of less than 30 liters per cylinder that use diesel fuel and operate for the purpose specified in §63.6640(f)(4)(ii), the permittee shall use diesel fuel that meets the requirements in §80.510(b) for

¹ If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in Table 2d of MACT ZZZZ, or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources shall report any failure to perform the management practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable.

² Sources have the option to utilize an oil analysis program as described in §63.6625(i) in order to extend the specified oil change requirement in Table 2d of MACT ZZZZ.

nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to January 1, 2015, may be used until depleted. [§63.6604(b)]

General Compliance Requirements:

1. The permittee shall be in compliance with the management practices that apply at all times. [§63.6605(a)]
2. At all times the permittee shall operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require you to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the director which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [§63.6605(b)]

Monitoring, Operation, and Maintenance Requirements:

1. The permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [§63.6625(e)]
2. The permittee shall install a non-resettable hour meter if one is not already installed. [§63.6625(f)]
3. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Table 2d to MACT ZZZZ. The oil analysis shall be performed at the same frequency specified for changing the oil in Table 2d to MACT ZZZZ. The analysis program shall at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee shall change the oil within two business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee shall change the oil within two business days or before commencing operation, whichever is later. The permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program shall be part of the maintenance plan for the engine. [§63.6625(i)]

Continuous Compliance Requirements:

1. The permittee shall demonstrate continuous compliance with each emission limitation, operating limitation, and other requirements in Table 2d to MACT ZZZZ that apply according to methods specified in Table 6 to MACT ZZZZ. [§63.6640(a)]
2. The permittee shall report each instance in which the permittee did not meet the requirements in Table 8 to MACT ZZZZ that apply. [§63.6640(e)]
3. The permittee shall operate the emergency stationary RICE according to the requirements in §63.6640(f)(1) through (4). In order for the engine to be considered an emergency stationary RICE under MACT ZZZZ, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in §63.6640(f)(1) through (4), is prohibited. If the permittee does not operate the engine

according to the requirements in §63.6640(f)(1) through (4), the engine will not be considered an emergency engine under MACT ZZZZ and shall meet all requirements for non-emergency engines. [§63.6640(f)]

- a) There is no time limit on the use of emergency stationary RICE in emergency situations. [§63.6640(f)(1)]
- b) The permittee may operate the emergency stationary RICE for any combination of the purposes specified in §63.6640(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by §63.6640(f)(3) and (4) counts as part of the 100 hours per calendar year allowed by this paragraph. [§63.6640(f)(2)]
 - i) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [§63.6640(f)(2)(i)]
- c) Emergency stationary RICE located at area sources of HAP may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §63.6640(f)(2). Except as provided in §63.6640(f)(4)(ii), the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§63.6640(f)(4)]
 - i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§63.6640(f)(4)(ii)]
 - (1) The engine is dispatched by the local balancing authority or local transmission and distribution system operator. [§63.6640(f)(4)(ii)(A)]
 - (2) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [§63.6640(f)(4)(ii)(B)]
 - (3) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [§63.6640(f)(4)(ii)(C)]
 - (4) The power is provided only to the facility itself or to support the local transmission and distribution system. [§63.6640(f)(4)(ii)(D)]
 - (5) The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the permittee. [§63.6640(f)(4)(ii)(E)]

Table 6 to MACT ZZZZ – Continuous Compliance With Emission Limitations, and Other Requirements

For each...	Complying with the requirement to...	The permittee shall demonstrate compliance by...
Existing emergency and black start stationary RICE located at an area source of HAP	Work or Management practices	i. Operating and maintaining the stationary RICE according to the manufacturer's emission-related operation and maintenance instructions; or ii. Develop and follow a maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

General Provisions:

The permittee shall comply with §§63.1 through 63.15 as specified by Table 8 to MACT ZZZZ.

Recordkeeping and Reporting:

1. the permittee shall submit an annual report according to the requirements in §63.6650(h)(1) through (3). [§63.6650(h)]
 - a) The report shall contain the following information: [§63.6650(h)(1)]
 - i) Company name and address where the engine is located. [§63.6650(h)(1)(i)]
 - ii) Date of the report and beginning and ending dates of the reporting period. [§63.6650(h)(1)(ii)]
 - iii) Engine site rating and model year. [§63.6650(h)(1)(iii)]
 - iv) Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place. [§63.6650(h)(1)(iv)]
 - v) Hours spent for operation for the purpose specified in §63.6640(f)(4)(ii), including the date, start time, and end time for engine operation for the purposes specified in §63.6640(f)(4)(ii). The report shall also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine. [§63.6650(h)(1)(vii)]
 - vi) If there were no deviations from the fuel requirements in §63.6604 that apply to the engine (if any), a statement that there were no deviations from the fuel requirements during the reporting period. [§63.6650(h)(1)(viii)]
 - vii) If there were deviations from the fuel requirements in §63.6604 that apply to the engine (if any), information on the number, duration, and cause of deviations, and the corrective action taken. [§63.6650(h)(1)(ix)]
 - b) annual reports for each calendar year shall be submitted no later than March 31 of the following calendar year. [§63.6650(h)(2)]
 - c) The annual report shall be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to MACT ZZZZ is not available in CEDRI at the time that the report is due, the written report shall be submitted to the Administrator at the appropriate address listed in §63.13. [§63.6650(h)(3)]
2. The permittee shall keep the records described in §63.6655(a)(2) through (a)(5). [§63.6655(a)]
 - a) Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. [§63.6655(a)(2)]
 - b) Records of performance tests and performance evaluations as required in §63.10(b)(2)(viii). [§63.6655(a)(3)]

- c) Records of all required maintenance performed on the air pollution control and monitoring equipment. [§63.6655(a)(4)]
- d) Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [§63.6655(a)(5)]
- 3. The permittee shall keep the records required in Table 6 of MACT ZZZZ to show continuous compliance with each management practice that applies. [§63.6655(d)]
- 4. The permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE and after-treatment control device (if any) according to a maintenance plan. [§63.6655(e)]
- 5. The permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engine is used for the purposes specified in §63.6640(f)(4)(ii), the permittee shall keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [§63.6655(f)]
- 6. Records shall be in a form suitable and readily available for expeditious review according to §63.10(b)(1). [§63.6660(a)]
- 7. As specified in §63.10(b)(1), the permittee shall keep each record for five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [§63.6660(b)]
- 8. The permittee shall keep each record readily accessible in hard copy or electronic form for at least five years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). [§63.6660(c)]

Permit Condition 8		
10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60, Subpart IIII –Standards of performance for Stationary Compression Ignition Internal Combustion Engines		
EIQ #	Description	Manufacturer/ Model #
Insig-9	Research North Building emergency generator, Kohler Power Systems, installed approx. 2011; model year 2010; MHDR=111.5 gallons/hr, diesel fuel fired; 2,328 HP; 1736 kW, Tier 2 emission rated	Kohler; model 1500REOZDC
Insig-11	“C” Research building emergency generator, Kohler Power Systems, installed 2014, model year 2013, MHDR=8.2 gallons/hr, diesel fuel fired; 158 HP; 118 kW Tier 3 emission rated	Kohler; model 100REOZJF

Emission Standards:

- 1. The permittee shall comply with the emission standards for new nonroad CI engines in §60.4202, for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE. [§60.4205(b)]
 - a. Stationary CI internal combustion engine manufacturers must certify their 2007 model year and later emergency stationary CI ICE with a maximum engine power less than or equal to 3,000 HP and a displacement of less than 10 liters per cylinder that are not fire pump engines to the emission standards specified in §60.4202(a)(2). [§60.4202(a)]

- i. For engines with a maximum engine power greater than or equal to 37 KW (50 HP), the certification emission standards for new nonroad CI engines for the same model year and maximum engine power in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants beginning in model year 2007. [§60.4202(a)(2)]

(1) 40 CFR 89.112 Table 1-Emission Standards (g/kW-hr)

Rated Power (kW)	Tier	Model Year	NMHC+NO _x	CO	PM
130≤kW≥225	Tier 3	2006	4.0	3.5	0.20
kW≥560	Tier 2	2006	6.4	3.5	0.20

(2) Exhaust opacity from compression-ignition nonroad engines must not exceed: [40 CFR 89.113(a)(1) through (3)]

- A. 20 percent during the acceleration mode;
 - B. 15 percent during the lugging mode; and
 - C. 50 percent during the peaks in either the acceleration or lugging modes
2. The permittee shall operate and maintain stationary CI ICE that achieve the emission standards as required in §60.4205 over the entire life of the engine. [§60.4206]

Fuel Requirements:

The permittee shall only use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. [§60.4207(b)]

Monitoring Requirements:

The permittee shall install a non-resettable hour meter prior to startup of the engine. [§60.4209(a)]

Compliance Requirements:

1. The permittee shall do all of the following, except as permitted under §60.4211(g): [§60.4211(a)]
 - a. Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; [§60.4211(a)(1)]
 - b. Change only those emission-related settings that are permitted by the manufacturer; and [§60.4211(a)(2)]
 - c. Meet the requirements of 40 CFR Parts 89, 94 and/or 1068, as applicable. [§60.4211(a)(3)]
2. The permittee shall comply by purchasing an engine certified to the emission standards in §60.4205(b), for the same model year and maximum engine power. The engine shall be installed and configured according to the manufacturer's emission-related specifications, except as permitted in §60.4211(g). [§60.4211(c)]
3. The permittee shall operate the emergency stationary ICE according to the requirements in §60.4211(f)(1) through (3). In order for the engine to be considered an emergency stationary ICE under NSPS IIII, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in non-emergency situations for 50 hours per year, as described in §60.4211(f)(1) through (3), is prohibited. If the permittee does not operate the engine according to the requirements in §60.4211(f)(1) through (3), the engine will not be considered an emergency engine under NSPS IIII and shall meet all requirements for non-emergency engines. [§60.4211(f)]
 - a. There is no time limit on the use of emergency stationary ICE in emergency situations. [§60.4211(f)(1)]
 - b. The permittee may operate the emergency stationary ICE for any combination of the purposes specified in §60.4211(f)(2)(i) for a maximum of 100 hours per calendar year. Any operation for

non-emergency situations as allowed by §60.4211(f)(3) counts as part of the 100 hours per calendar year allowed by this paragraph. [§60.4211(f)(2)]

- i) Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition the director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. [§60.4211(f)(2)(i)]
- c. Emergency stationary ICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in §60.4211(f)(2). Except as provided in §60.4211(f)(3)(i), the 50 hours per calendar year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity. [§60.4211(f)(3)]
 - i) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: [§60.4211(f)(3)(i)]
 - (1) The engine is dispatched by the local balancing authority or local transmission and distribution system operator; [§60.4211(f)(3)(i)(A)]
 - (2) The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region. [§60.4211(f)(3)(i)(B)]
 - (3) The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines. [§60.4211(f)(3)(i)(C)]
 - (4) The power is provided only to the facility itself or to support the local transmission and distribution system. [§60.4211(f)(3)(i)(D)]
 - (5) The permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the permittee. [§60.4211(f)(3)(i)(E)]
4. If the permittee does not install, configure, operate, and maintain the engine and control device according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee shall demonstrate compliance as follows: [§60.4211(g)]
 - a. The permittee with an engine greater than 500 HP must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer. The permittee must conduct

subsequent performance testing every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards.
 [§60.4211(g)(3)]

General Provisions:

The permittee shall comply with the applicable General Provisions in §§60.1 through 60.19 as specified by Table 8 to NSPS III.

Reporting Requirements:

1. If the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the permittee must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee must record the time of operation of the engine and the reason the engine was in operation during that time. [§60.4214(b)]
2. The permittee with an emergency stationary CI ICE with a maximum engine power more than 100 HP that operates for the purposes specified in §60.4211(f)(3)(i), must submit an annual report according to the requirements in §60.4214(d)(1) through (3). [§60.4214(d)]
 - a. The report must contain the following information: [§60.4214(d)(1)]
 - i. Company name and address where the engine is located. [§60.4214(d)(1)(i)]
 - ii. Date of the report and beginning and ending dates of the reporting period. [§60.4214(d)(1)(ii)]
 - iii. Engine site rating and model year. [§60.4214(d)(1)(iii)]
 - iv. Latitude and longitude of the engine in decimal degrees reported to the fifth decimal place. [§60.4214(d)(1)(iv)]
 - v. Hours spent for operation for the purposes specified in §60.4211(f)(3)(i), including the date, start time, and end time for engine operation for the purposes specified in §60.4211(f)(3)(i). The report must also identify the entity that dispatched the engine and the situation that necessitated the dispatch of the engine. [§60.4214(d)(1)(vii)]
 - b. annual reports for each calendar year must be submitted no later than March 31 of the following calendar year. [§60.4214(d)(2)]
 - c. The annual report must be submitted electronically using the subpart specific reporting form in the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (www.epa.gov/cdx). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written report must be submitted to the Administrator at the appropriate address listed in §60.4. [§60.4214(d)(3)]

Permit Condition 9		
10 CSR 10-6.060 Construction Permits Required		
Construction Permit #09-10-020, Issued January 11, 2010		
EIQ #	Description	Manufacturer/Model #
EP-12	'C' Building Diesel Peak Shaving Generator, manufactured 2008; installed April 22, 2008; 1005.8 HP compression ignition engine with 750 kW generator, 53.5 gallons/hour	Caterpillar Model # CAT C27 ATAAC, DM9071;

Operational Limitations:

1. The permittee shall operate the generator no more than 1200 hours per consecutive 12 month period. [Special Condition # IIA.]
2. The permittee shall only fuel the generator with #2 fuel oil that complies with 40 CFR part 60 Subpart III. [Special Condition # IIB]:
3. The permittee shall operate the generator only during peak shaving episodes, periods of interrupted power supply from the local utility, and for maintenance activities. [Special Condition # III.A]
4. The generator shall be equipped with a non-resettable meter to record operational hours. [Special Condition # III.B]
5. The permittee shall operate and maintain the generator engine according to the manufacturer’s written instructions or procedures developed by the permittee that are approved by the engine manufacturer. The permittee may only change those settings that are permitted by the manufacturer. [Special Condition # IIIC]
6. The generator engine must be certified by the manufacturer to meet the applicable federal emission standards. The generator engine must be installed and configured according to the manufacturer’s specifications. [Special Condition # III.D.]

Emissions Limitations:

1. The emissions from the generator engine shall not exceed the applicable limits in 40 CFR part 60 Subpart III. [Special Condition # IIC]. These limits appear in Permit Condition 10 of this operating permit.

Recordkeeping:

1. The permittee shall maintain monthly records of the hours of operation for the generator, including a total for each consecutive 12 month period. The records must include a reason for each period of operation. [Special Condition # IV.A]
2. The permittee shall maintain records demonstrating compliance with the fuel standards as specified in 40 CFR part 60 Subpart III. [Special Condition # IV.B.]
3. The permittee shall maintain, for the life of the equipment, documentation from the generator engine manufacturer certifying compliance with the emissions limitations. [Special Condition # IV.C]
4. The permittee shall maintain, for the life of the equipment, the manufacturer’s written operating instructions or operation and maintenance procedures developed by the permittee that are approved by the engine manufacturer. [Special Condition # IV.D]
5. The permittee shall use Attachments G and I, or equivalents, to demonstrate compliance with this permit condition.

Permit Condition 10		
10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60, Subpart III –Standards of performance for Stationary Compression Ignition Internal Combustion Engines		
EIQ #	Description	Manufacturer/Model #
EP-12	‘C’ Building Diesel Peak Shaving Generator, manufactured 2008; installed April 22, 2008; 1005.8 HP (750 kW) compression ignition engine, 53.5 gallons/hour, Tier 2 emission rated	Caterpillar Model # CAT C27 ATAAC, DM9071

Emission Limitation:

1. The permittee must operate and maintain stationary CI ICE that achieve the emission standards as required in §§60.4204 and 60.4205 over the entire life of the engine. [§60.4206]
2. The permittee of non-emergency stationary CI ICE with a displacement of less than 30 liters per cylinder who conduct performance tests in-use must meet the not-to-exceed (NTE) standards as indicated in §60.4212. [§60.4204(d)]
3. The permittee must comply with the emission standards for new CI engines in §60.4201. [§60.4204(b)]
 - a. Stationary CI internal combustion engine manufacturers must certify their engines to the certification emission standards for new nonroad CI engines in 40 CFR 89.112 and 40 CFR 89.113, for the same model year and maximum engine power.[§60.4201(a)]
 - i. Exhaust emission shall not exceed the applicable exhaust emission standards contained in Table 1, as follows: [40 CFR 89.112, Table 1]
 - A. 6.4 g/KW-hr for NMHC+NO_x
 - B. 3.5 g/KW-hr for CO
 - C. 0.20 g/KW-hr for PM
 - ii. Exhaust opacity must not exceed: [40 CFR 89.113]
 - A. 20 percent during the acceleration mode;
 - B. 15 percent during the lugging mode; and
 - C. 50 percent during the peaks in either the acceleration or lugging modes

Fuel Requirements:

The permittee must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. [§60.4207(b)]

Compliance Requirements:

1. The permittee must do all of the following, except as permitted under §60.4211(g): [§60.4211(a)]
 - a. Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; [§60.4211(a)(1)]
 - b. Change only those emission-related settings that are permitted by the manufacturer; and [§60.4211(a)(2)]
 - c. Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as applicable. [§60.4211(a)(3)]
2. The permittee with a 2007 model year and later stationary CI internal combustion engine which must comply with the emission standards specified in §60.4204(b) must comply by purchasing an engine certified to the emission standards in §60.4204(b) for the same model year and maximum engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in §60.4211(g). [§60.4211(c)]
3. If the permittee does not install, configure, operate, and maintain the engine and control device according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows: [§60.4211(g)]
 - a. The permittee with a stationary CI internal combustion engine greater than 500 HP must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1

year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after changing emission-related settings in a way that is not permitted by the manufacturer. The permittee must conduct subsequent performance testing every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards. [§60.4211(g)(3)]

General Provisions:

The permittee shall comply with the applicable General Provisions in §§60.1 through 60.19 as specified by Table 8 to NSPS IIII.

Permit Condition 11		
10 CSR 10-6.070 New Source Performance Regulations 40 CFR Part 60, Subpart IIII –Standards of performance for Stationary Compression Ignition Internal Combustion Engines		
EIQ #	Description	Manufacturer/Model #
Insig-10	Zappi emergency fire pump engine, Kohler Power Systems, installed 2014; model year 2013; MHDR=17.6 gallons/hr; diesel fuel fired, 385 HP (287 kW)	Kohler; model 250REOZJE

Emission Limitations:

1. The permittee must operate and maintain stationary CI ICE that achieve the emission standards as required in §60.4205 over the entire life of the engine. [§60.4206]
2. The permittee shall comply with the emission standards in Table 4 of this subpart [§60.4205(c) and Table 4]:
 - a. 4.0 g/KW-hr for NMHC + NOX
 - b. 0.20 g/KW-hr for PM

Fuel Requirements:

Beginning October 1, 2010, the permittee of stationary CI ICE subject to this subpart with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel. [§60.4207(b)]

Monitoring:

The permittee must install a non-resettable hour meter prior to startup of the engine. [§60.4209(a)]

Compliance Requirements:

1. The permittee must do all of the following, except as permitted under §60.4211(g): [§60.4211(a)]
 - a. Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; [§60.4211(a)(1)]
 - b. Change only those emission-related settings that are permitted by the manufacturer; and [§60.4211(a)(2)]
 - c. Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as applicable. [§60.4211(a)(3)]
2. The permittee of a CI fire pump engine that is manufactured during or after the model year that applies to the fire pump engine power rating in table 3 to this subpart and must comply with the emission standards specified in §60.4205(c), must comply by purchasing an engine certified to the emission standards in §60.4205(c), for the same model year and maximum (or in the case of fire

- pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in §60.4211(g). [§60.4211(c)]
3. If the permittee does not install, configure, operate, and maintain your engine and control device according to the manufacturer's emission-related written instructions, or changes emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows: [§60.4211(g)]
 - a. The permittee of a stationary CI internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after changing emission-related settings in a way that is not permitted by the manufacturer. [§60.4211(g)(2)]

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. The following are only excerpts from the regulation or code, and are 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. 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.

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) 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 to the director in writing at least ten days prior to any maintenance, start-up or shutdown activity 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, notice shall be given as soon as practicable prior to the activity.
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. The permittee shall retain the most current operating permit issued to this installation on-site. The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request.

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

10 CSR 10-6.100 Alternate Emission Limits

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

10 CSR 10-6.110 Reporting of Emission Data, Emission Fees and Process Information

1. The permittee shall submit a Full Emissions Report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the director.
2. 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.
3. The permittee shall submit a full EIQ for the 2017 and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
4. In addition to the EIQ submittal schedule outlined above, any permit issued under 10 CSR 10-6.060 section (5) or (6) triggers a requirement that a full EIQ be submitted in the first full calendar year after the permitted equipment initially operates.

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 10-6.165 Restriction of Emission of Odors

This is a State Only permit requirement.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

1. The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the director.
2. The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
3. Should it be determined that noncompliance has occurred, the director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;
 - d) Application of water; and
 - e) Planting and maintenance of vegetative ground cover.

Monitoring:

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

1. The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.

2. Should no violation of this regulation be observed during this period then-
 - a) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - b) If a violation is noted, monitoring reverts to weekly.
 - c) Should no violation of this regulation be observed during this period then-
 - i) The permittee may observe once per month.
 - ii) If a violation is noted, monitoring reverts to weekly.
3. If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency.

Recordkeeping:

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

1. Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
2. Whether equipment malfunctions contributed to an exceedance.
3. Any violations and any corrective actions undertaken to correct the violation.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

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

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

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees.

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 at an installation:
 - 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.

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

No owner or operator shall operate applicable hand-fired fuel burning equipment unless the owner or operator meets the conditions set forth in 10 CSR 10-5.040. This regulation shall apply to all hand-fired fuel-burning equipment at commercial facilities including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing or to other equipment exempted under 10 CSR 10-5.040. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Rescinded on February 11, 1979, Contained in State Implementation Plan)

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

40 CFR Part 82 Protection of Stratospheric Ozone (Title VI)

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 40 CFR §82.106.
 - b) The placement of the required warning statement must comply with the requirements of 40 CFR §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements of 40 CFR §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in 40 CFR §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 of 40 CFR Part 82:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices described in 40 CFR §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment described in 40 CFR §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with the record keeping requirements of 40 CFR §82.166. ("MVAC-like" appliance as defined at 40 CFR §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR §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 40 CFR §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 contained 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.*

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, §(6)(C)1.B, §(5)(E)2.C 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. If a timely and complete application for a permit renewal is submitted, but the Air Pollution Control Program fails to take final action to issue or deny the renewal permit before the end of the term of this permit, this permit shall not expire until the renewal permit is issued or denied.

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, Compliance and 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. 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)

If the installation is required to develop and register a risk management plan pursuant to Section 112(R) of the Act, the permittee will verify that it has complied with the requirement to register the plan.

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, Compliance and 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 contemporaneous written notice of the change to the Air Pollution Control Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 11201 Renner Blvd., Lenexa, KS 66219. 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)34 Responsible Official

The application utilized in the preparation of this permit was signed by Gene McCoskey, Managing Director, Site Services. 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 (MoDNR) 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. MoDNR 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 C

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

Readings ranged from _____ to _____ % opacity.

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

Attachment E
 Plant Wide NO_x Emissions

This sheet covers the month of _____ in the year _____.
 Copy this sheet as needed.

Column 1 (a)	Column 2	Column 3	Column 4 (b)	Column 5
Emission unit category (Boilers, engines, other)	Fuel Type Used (Natural gas or Fuel oil)	Amount of fuel used this month	Emission factor	NO _x Emissions (Tons)
(c) Total NO _x Emissions Calculated for this Month in Tons:				
(d) 12-Month NO _x Emissions Total from Previous Month's Attachment E in Tons:				
(e) Monthly NO _x Emissions Total (b) from Previous Year's Attachment E in Tons:				
(f) Current 12-month Total of NO _x Emissions in Tons: [(b) + (c) - (d)]				

- (a) Emission units are separated into three groups: boilers, which can burn natural gas or fuel oil, engines which can burn fuel oil only, and other. The other category is for the dryers, heaters, and miscellaneous sources at the installation that burn natural gas. All sources of NO_x at this installation fit into one of these three categories. All combustion units must be accounted for to comply with the plant wide limitation.
- (b)
 - 1) If emission unit is other or boilers and fuel type is natural gas, emission factor is 100 lb NO_x/MMCF. To convert to MMBtu, use conversion factor of 1020 MMBtu/MMCF. Source SCC 10300602 and AP42 Table 1.4-1.
 - 2) If emission unit is boilers and fuel type is fuel oil, emission factor is 20 lb NO_x/1000 gallons. To convert to MMBtu, use conversion factor of 140 MMBtu/1000 gallons. Source SCC 10200501 and AP42 Table 1.3-2.
 - 3) If emission unit is engine, fuel type is fuel oil and emission factor is 438 lb NO_x/1000 gallon. To convert to MMBtu, use conversion factor of 137 MMBtu/1000 gallons. Source SCC 20200401 and AP42 Table 3.4-1.
 - 4) Differences in heating values for fuel oil are due to differences in the emission factor development process for these units, see AP42 Background Documents for additional information.
- (c) Summation of [Column 5] in Tons;
- (d) 12-Month NO_x emissions total (d) from last month's Attachment E in Tons;
- (e) Monthly NO_x emissions total (e) from previous year's Attachment E in Tons;
- (f) **Calculate the new 12-month NO_x emissions total. The total must include start up, shutdown, and malfunction emissions. A 12-Month NO_x emissions total (f) of less than 100 tons indicates compliance.**

Attachment H
 Records for Cold Cleaners

Solvent Containing Waste Transfer Log

Date	Amount of Total Solvent Transferred (gallons)	Amount of Solvent Transferred to a Contract Reclamation Service (gallons)	Amount of Solvent Transferred to a Disposal Facility (gallons)	Amount of Solvent Distilled on the Premises (gallons)

Purchase Records for Cold Cleaning Solvent

Date	Solvent Supplier Name	Solvent Supplier Address	Type of Solvent	Solvent Volatility in mmHg at 20°C (68°F)

Employee Solvent Metal Cleaning Training Log

Date	Title of Solvent Metal Cleaning Training Course	Instructor

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.

INSTALLATION DESCRIPTION

Nestle Purina PetCare Company has its corporate headquarters complex located in St. Louis, Missouri. The complex includes office buildings, research laboratories and pilot plants for experimental pet food and pet litter production processes. Emissions sources include dual fuel fired boilers, emergency and peak shaving generators, pet food research operations, and a small print shop. The installation has requested a voluntary limit on NO_x emissions in order to qualify for this Intermediate Operating Permit. The last five years of reported emissions and the potential to emit for the installation appear in the following table.

Potential to emit values for the print shop and paint booth were taken from issued construction permits. Otherwise, all units, except where noted, were evaluated assuming 8760 hours per year, and federally enforceable requirements. Natural gas emission factors were taken from SCC 10300602 for all natural gas combustion, emergency generator emission factors are from SCC 20200401. The emergency generators were evaluated at 500 hours per year, except for EP-12 which was evaluated at 1200 hours per year and EP-11 which was evaluated at 1100 hours per year. Emissions from the storage tanks, thermoforming machine, and plant maintenance operations are not included. The installation has an unconditioned potential to emit NO_x of 139.2 tons/year; emissions are conditioned to less than 100 tons/year in order to qualify for this Intermediate Operating Permit. The installation is not on the list of Named Installations.

Emissions Profile, tons per year

Pollutants	2012	2013	2014	2015	2016	Potential to Emit
Particulate Matter ≤ Ten Microns (PM ₁₀)	0.26	0.26	0.31	0.31	0.31	7.23
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.26	0.26	0.31	0.31	0.31	6.51
Sulfur Oxides (SO _x)	0.53	0.53	0.02	0.02	0.02	0.53
Nitrogen Oxides (NO _x)	3.34	3.34	4.13	4.13	4.13	<100
Volatile Organic Compounds (VOC)	0.17	0.17	0.22	0.22	0.22	7.92
Carbon Monoxide (CO)	2.72	2.72	3.45	3.45	3.45	53.54

Pollutants	2012	2013	2014	2015	2016	Potential to Emit
Hazardous Air Pollutants (HAPs)	Not reported					2.13

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 date; revised date;
2. 2016 Emissions Inventory Questionnaire, received March 24, 2017;
3. U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.
4. webFIRE
5. All documents listed in construction permit history

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.

See Other Regulatory Determinations

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

This regulation applies to sellers and buyers of coal or residual fuel oil. This installation does not perform these activities, therefore this regulation has not been included in this permit.

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

This regulation applies to coal transport, sale, and usage of coal. This installation does not perform these activities, therefore this regulation has not been included in this permit.

10 CSR 10-5.220, *Control of Petroleum Liquid Storage, Loading and Transfer and*

These regulations do not apply to the 20,000 gallon fuel oil #2 storage tanks because these regulations apply to storage tanks that are at least 40,000 gallon capacity.

10 CSR 10-5.330, *Control of Emissions From Industrial Surface Coating Operations*

This regulation does not apply to the paint booth because the potential emissions of VOC from the paint booth, including related cleaning activities, is less than the applicability threshold of 3 tons VOC per consecutive twelve month period, see 5.330(1)(B). VOC emissions from the paint booth are limited to less than 1.4 tons/year by Construction Permit 97-10-098PM, and the potential emissions of all solvent cleaning is less than 1 ton/year.

10 CSR 10-5.442, *Control of Emissions From Lithographic and Letterpress Printing Operations*

This regulation does not apply to the printing operations because the total actual emissions are less than the applicability threshold of 3 tons VOC per twelve month rolling period, see 5.442(1)(B).

10 CSR 10-5.510, *Control of Emissions of Nitrogen Oxides*

This regulation applies to all installations within the specified counties that have the potential to emit 100 tons/year or greater of nitrogen oxides. According to (1)(C)1., any boiler with a maximum hourly design rate of less than 50 MMBtu/hr is exempt from this rule. All boilers at the installation meet this exemption.

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

This regulation applies to all installations within the specified counties that have the potential to emit 100 tons/year or greater of volatile organic compounds. This installation's potential emissions are less than 100 tons/year of volatile organic compounds, therefore this regulation does not apply.

10 CSR 10-5.570, *Control of Sulfur Emissions From Stationary Boilers*

The boilers combust either natural gas or fuel oil #2 with less than 0.0015% sulfur content and are therefore exempt from this rule per 5.570(1)(C)5.

10 CSR 10-6.390, *Control of NO_x Emissions From Large Stationary Internal Combustion Engines*

The emergency generators are exempt from this rule per 6.390(1)(C) because they meet the definition of emergency standby engine which defines the term as "An internal combustion engine used only when normal electrical power or natural gas service is interrupted, or for the emergency pumping of water for either fire protection or flood relief. An emergency standby generator may not be operated to supplement a primary power source when the load capacity or rating of the primary power source has been either reached or exceeded." If the engines that have at least 1,300 HP are used in a way that no longer meets this definition, they will become subject this regulation. This regulation does not apply to EP-12 as the unit is 1005.8 HP, which is less than the applicability value of 1,300 HP.

10 CSR 10-6.405, *Restriction of Particulate Matter Emissions From Fuel Burning Equipment Used for Indirect Heating*

The installation is exempt per 6.405(1)(E) because all of the combustion units are fueled only by natural gas or #2 fuel oil.

Construction Permit History

The following construction permits were issued to this installation. Only construction permits that are issued under the authority of 10 CSR 10-6.060 are included in this document review. Any source registrations issued by the City of St. Louis under the authority of their local ordinances are not included, as these source registrations are not federally or state enforceable.

1. Construction Permit #97-10-098

This permit was issued September 15, 1999 to authorize installation of an emergency generator and a paint booth. The emergency generator is a 600 kW, diesel fired unit generally used during

times of interrupted power. The paint booth is used by the maintenance department to paint doors and other miscellaneous parts. The booth is fitted with a fiberglass filter with a control efficiency of 90% for PM₁₀. This permit contains special conditions that appear in this operating permit. The conditions IIA and B were revised in Construction Permit #97-10-098PM.

2. Construction Permit #01-08-023

This permit was issued October 15, 2001 to authorize the installation of a small sheet fed offset lithography printing shop. The shop consists of the following equipment: Encomatic Negative Plate Processor (PRT-1), Ultra Plus Flip Top Plate Maker (PRT-2), Itek Paper Plate Maker (PRT-3), Davidson Sheet-Fed Printing Press, one color (PRT-4), Ryobi Sheet-Fed Printing Press, 2 color (PRT-5), and two Multigraphic Sheet-Fed Printing Presses, 2 color (PRT-6 and 6A). This permit does contain special conditions, however they are not included in this Operating Permit due to Construction Permit Nullification #01-08-023.

3. Construction Permit Nullification #01-08-023

This letter, dated September 12, 2003, nullifies Construction Permit #01-08-023 on the basis that the potential emissions of the units are not above the thresholds for which a Construction Permit is required. The potential emissions of the units are 1.42 tons VOC/year, which converts to 0.32 lbs VOC/hour. This is less than the 0.5 lb/hr construction permitting thresholds for VOC and HAP emissions, assuming all the VOCs are HAPs.

4. Construction Permit #97-10-098PM

This permit modification was issued October 12, 2004 to revise the emission limitations for the paints and solvents used in the paint booth. To provide flexibility, the original conditions were changed from a paint and thinner throughput limitation to an emissions limitation. This limitation appears in the Operating Permit as an emission unit specific limitation.

5. Construction Permit #05-08-007

This permit was issued September 26, 2005 to authorize installation of a Caterpillar generator for "A" Building. This construction permit contains special conditions that appear in this Operating Permit. The installation has indicated that they will no longer use this unit as a peak shaving unit, and will restrict operations to emergencies as defined in 40 CFR part 63 Subpart ZZZZ. This Construction Permit contains restrictions that are more stringent than MACT ZZZZ, and must be included in this Operating Permit.

6. Construction Permit #09-10-020

This permit was issued January 11, 2010 to authorize the change in classification of an electrical generator. The generator was originally installed with the purpose of being an emergency generator, but the installation has requested to reclassify the generator for peak shaving use, as well as for emergency use. With the change in classification came a removal of the 500 hour/year operational limitation, which defines emergency generators, and therefore an increase in emissions. This increase was substantial enough to meet the requirements to obtain a construction permit. This permit contains special conditions. With the exception of the opacity and fuel sulfur content requirements, these special conditions appear as emission unit specific limitations in this Operating Permit. The fuel sulfur content requirement is listed as a plant wide limitation. The state rule containing the opacity requirements specifically exempts stationary

internal combustion engines operated inside the limits of St. Louis metropolitan area from the regulation, and is therefore not included in this operating permit.

7. No Permit Required Letter PAMS # 2011-09-007

This letter was issued to authorize the installation of a Kohler Power Systems emergency generator model 1500REOZDC for the Research North Building. The engine is a model year 2010, Tier II emission rated engine. It is diesel fired and rated at 2,328 HP; it consumes 111.5 gallons of diesel per hour at 100% load in standby mode. The generator will be used for emergency purposes only, with less than 100 hours per year of non-emergency (maintenance and testing) us per 40 CFR 89.112. Since the engine is equipped with a non-resettable hour meter, it meets the exemption in 10 CSR 10-6.061(3)(A)BB., and no construction permit is required.

8. Permit Required Determination PAMS # 2011-09-025

This letter, dated September 26, 2011 states that a construction permit is required to install two boilers. These units were installed under Construction Permit #012012-003.

9. Construction Permit #012012-003

This permit was issued January 9, 2012 to authorize the replacement of three 300 HP gas boilers (EP-02 through EP-04) with two new 500 HP dual fuel boilers (EP-14 and EP-15). Because this project and the emergency generator project (see 2011-09-007) have only one month between their submittal dates, they are considered one project for permitting purposes. This results in the emergency generator potential emissions and boiler replacement potential emissions being included in the evaluation of this construction permit. This permit contains special conditions regarding #2 fuel oil usage. Permit condition 1C has been applied on a plant wide basis in this operating permit by request. All of the other conditions have been applied on a unit-specific basis.

10. Construction Permit Amendment 97-10-098A

This amendment was issued March 23, 2017 to modify conditions of permits 97-10-098 and 97-10-098PM. This amendment removes the visible emissions limitation from the generator.

11. Construction Permit Amendment 09-10-020A

This amendment was issued March 23, 2017 to modify conditions of permit 09-10-020. This amendment removes the visible emissions limitation from the generator.

New Source Performance Standards (NSPS) Applicability

40 CFR part 60 Subpart D, Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction is Commenced After August 17, 1971

40 CFR part 60 Subpart Da, Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978

40 CFR part 60 Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

These regulations apply to boilers larger than 100 MMBtu/hr (for Db) or 250 MMBtu/hr (for D and Da). The boilers at this installation are rated less than these applicability thresholds, therefore these rules do not apply.

40 CFR part 60 Subpart Dc, Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units

This regulation applies to boilers that were installed after June 9, 1989 and are sized between 10 and 100 MMBtu/hr.

This regulation does not apply to EP-1 (Boiler #1) because the unit was installed prior to June 9, 1989. The regulation does apply to EP-14 and EP-15 (Boiler #2 and #3). The regulation requires the sulfur content of the fuel oil to be 5% weight percent or less. However, Construction Permit 012012-003 requires a more stringent limit of 0.0015% weight percent sulfur. By request, the requirements of this regulation have been combined into the voluntary plant wide limitation for the sulfur content of the fuel oil.

40 CFR part 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines

This rule applies to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE). For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator

This rule applies to the following engines:

EQ #	Description
EP-12	“C” Building Diesel Peak Shaving Generator, manufactured 2008; installed April 22, 2008; 1005.8 HP compression ignition engine with 750 kW generator, 53.5 gallons/hour, Tier 2 emission rated
Insig-9	Research North Building emergency generator, Kohler Power Systems, installed approx. 2011; model year 2010; MHDR=111.5 gallons/hr, diesel fuel fired; 2,328 HP; Tier 2 emission rated
Insig-11	“C” Research building emergency generator, Kohler Power Systems, installed 2014, model year 2013, MHDR=8.2 gallons/hr, diesel fuel fired; 158 HP; 118 kW Tier 3 emission rated
Insig-10	Zappi emergency fire pump engine, Kohler Power Systems, installed 2014; model year 2013; MHDR=17.6 gallons/hr; diesel fuel fired, 385 HP (287 kW)

The Kohler engines located at the Research North Building and the C Research Building will be operated as emergency engines under this rule, and the Zappi Building engine is classified as an emergency fire pump engine. The ‘C’ Building diesel generator (EP-12) will be operated during peak shaving and emergency situations.

The Kohler emergency generator located at the Research North Building is a 2010 model year engine, rated at 2,328 HP, with less than 10 L/cylinder displacement. This engine is Tier 2 rated by the manufacturer. This engine was installed under the authority of No Permit Required Letter #2011-09-007. This letter was issued on the basis that this unit is an emergency engine, as defined in the state regulations. These requirements are contained in 10 CSR 10-6.061, Construction Permit Exemptions, section (3)BB. To maintain this exemption from construction permitting, this engine must continue to be operated in compliance with these restrictions. Therefore, the permit condition for Subpart IIII contains the provisions for emergency engines only. If the permittee wishes to operate this engine outside of these restrictions, a construction permit review is required and all requirements of Subpart IIII would apply.

The Kohler emergency generator located at the C Research Building is a 2013 model year engine, rated at 158 HP with less than 10 L/cylinder displacement. This engine was installed in 2014 and is Tier 3 rated by the manufacturer. The installation is not required to obtain a construction permit for this unit as long as it meets the exemption requirements found in 10 CSR 10-6.061, Construction Permit Exemptions, section (3)BB. To maintain this exemption from construction permitting, this engine must continue to be operated in compliance with these restrictions. Therefore, the permit condition for Subpart IIII contains the provisions for emergency engines only. If the permittee wishes to operate this engine outside of these restrictions, a construction permit review is required and all requirements of Subpart IIII would apply.

The Kohler emergency fire pump engine located at the Zappi Building is a 2013 model year engine, rated at 385 HP, with less than 10 L/cylinder displacement. This engine was installed in 2014 and is Tier 3 rated by the manufacturer. The installation is not required to obtain a construction permit for this unit as long as it meets the exemption requirements found in 10 CSR 10-6.061, Construction Permit Exemptions, section (3)BB. To maintain this exemption from construction permitting, this engine must continue to be operated in compliance with these restrictions. Additionally, the permit condition for Subpart IIII contains the provisions for emergency fire pump engines only. If the permittee wishes to operate this engine outside of these restrictions, a construction permit review is required and all requirements of Subpart IIII would apply.

The 'C' Building generator is a 2008 model year engine, rated at 1005.8 HP, with less than 10 L/cylinder displacement. This engine is Tier 2 rated by the manufacturer. This engine was installed under the authority of Construction Permit #09-10-020. This engine will be used for both peak shaving and emergency use. While Subpart IIII does not contain any restrictions on the usage of the unit for emergency situations, the construction permit contains a 1200 hour per year restriction. This limit applies for all usage, including peak shaving, emergency, testing, and maintenance.

Maximum Achievable Control Technology (MACT) Applicability

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

The provisions of this subpart apply to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent. The concentration of these solvents may be determined using EPA test method 18, material safety data sheets, or engineering calculations. Wipe cleaning activities, such as using a rag containing halogenated solvent or a spray cleaner containing halogenated solvent are not covered under the provisions of this subpart.[§63.460(a)]

The cold cleaner does not use any solvent containing the referenced halogenated HAP solvents in a total concentration of greater than 5% by weight. Therefore this regulation does not apply. Under the permit requirements for 10 CSR 10-5.300, Control of Emissions From Solvent Metal Cleaning, the permittee is required to keep MSDS for all solvents used in the cold cleaner. These MSDS can be used to document that the installation continues to use solvents that do not contain the halogenated HAP solvents in a total concentration of greater than 5% by weight.

40 CFR part 63 Subpart HHHHHH, National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

The provisions of this subpart apply installations that perform one or more of the following activities and are area sources of HAPs:

1. Paint stripping using MeCl for the removal of dried paint from wood, metal, plastic, and other substrates;
2. Spray application of coatings, to motor vehicles and mobile equipment, except spray coating applications that meet the definition of facility maintenance; and
3. Spray application of coatings that contain the target HAP (compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).), to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle.

The definition of facility maintenance includes the following activities:

1. Surface coating performed as part of the routine repair or renovation of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected facility and that are necessary for the facility to function in its intended capacity;
2. Surface coating associated with the installation of new equipment or structures, and the application of any surface coating as part of janitorial activities;
3. Application of coatings to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs; and
4. Refinishing of mobile equipment in the field or at the site where they are used in service and at which they are intended to remain indefinitely after refinishing.

The painting operations at this installation satisfy the definition of facility maintenance, therefore this regulation does not apply.

40 CFR part 63 Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

This subpart applies to industrial, commercial, or institutional boilers that are located at an area source of hazardous air pollutants (HAP).

According to §63.11195(e), boilers that meet the definition of gas fired boiler are not subject to any of the provisions of this subpart. Gas-fired boiler is defined as “includes any boiler that burns gaseous fuels not combined with any solid fuels and burns liquid fuel only during periods of gas curtailment, gas supply interruption, startups, or periodic testing on liquid fuel. Periodic testing of liquid fuel shall not exceed a combined total of 48 hours during any calendar year.”

Boilers EP-14 and EP-15 have construction permit special conditions that ensure these boilers meet this definition. Boiler EP-1 does not have any federally enforceable limitations to ensure the unit continually meets the exemption, so a voluntary permit condition specifying the limitations of the exemption has been included in this operating permit. Since all three boilers will have to satisfy the same requirements, the requirements Construction Permit #012012-003 and this subpart were combined into one permit condition.

40 CFR part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters

This subpart applies to industrial, commercial, or institutional boilers or process heaters that are located at major sources of HAP. This installation is not a major source of HAP, therefore this regulation does not apply.

40 CFR part 63 Subpart ZZZZ, National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

This subpart applies to stationary RICE at major and area sources of HAP emissions. Existing stationary RICE, for area sources of HAP, are defined as engines for which construction or reconstruction commenced before June 12, 2006.

The installation has indicated that all “existing” emergency generators, will be used according to the provisions of §63.6640(f). Those provisions have been applied in the permit. The “new” engines are not regulated under the provisions of Subpart ZZZZ. They are regulated under 40 CFR part 60 Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines.

40 CFR part 63, Subpart XXXXXX—National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories

This subpart applies to area sources that are primarily engaged in the operations in one of the nine source categories listed in §60.11514(a) and (b). These categories include abrasive blasting, machining, dry grinding/dry polishing, spray painting, and welding activities.

This regulation does not apply because this installation is not “primarily engaged” in these activities, as defined in §63.11522. These activities do occur on-site, however only during facility maintenance operations. According to §63.11514(f) this subpart does not apply to facility maintenance.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR part 61, Subpart M-National Emission Standard for Asbestos

The permittee indicated on the Operating Permit application that the installation is subject to this regulation. It is included in Section IV, Core Permit Requirements.

Greenhouse Gas Emissions

Note that this source may be subject to the Greenhouse Gas Reporting Rule. Missouri regulations do not require the installation to report CO₂ emissions in their Missouri Emissions Inventory Questionnaire; therefore, the installation’s CO₂ emissions were not included within this permit. If required to report, the applicant is required to report the data directly to EPA. The public may obtain CO₂ emissions data by visiting <http://epa.gov/ghgreporting/ghgdata/reportingdatasets.html>.

Other Regulatory Determinations

10 CSR 10-5.500, *Control of Emissions From Volatile Organic Liquid Storage*

Section (4)(F) of this regulation contains a recordkeeping requirement for all storage tanks with capacities less than 40,000 gallons. This recordkeeping requirement has been included in this permit. There are no other provisions of this regulation that apply.

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

This regulation was rescinded from the code of state regulations (CSR). However, this regulation is still contained in Missouri's State Implementation Plan (SIP). This regulation is a federally enforceable requirement until it is removed from the SIP, therefore it must appear in this operating permit. This regulation applies to any installation that is a source of sulfur compound emissions. All of the units that are subject to this regulation combust either natural gas or fuel oil #2. Boilers #2 and #3 meet the exemption in 6.260(1)(A)1, as they are subject to the sulfur requirements in 40 CFR part 60 Subpart Dc. The pet food research operations and other units only combust natural gas and meet the exemption in §6.260(1)(A)2. Boiler #1 and the generators are explained below:

Boiler #1 (EP 1):

AP-42 Table 1.3-1 indicates potential emissions of $142S+5.7S$ lb SO_x/10³ gallons, where S is the sulfur content. Using S=0.0015% and a heating value of 140 MMBtu/10³ gallons, the emission factor is 0.00158 lbs SO_x/MMBtu. This is less than 2.3 lb SO_x/MMBtu specified in (3)(B)3.B.(II), therefore this regulation does not apply to the boiler.

The emergency generators subject to NSPS IIII must comply with the limitations on the sulfur content of the diesel fuel found in §80.510(b). Since this is an operational limitation on the fuel type, and not an emissions limitation, these units are subject to this rule. Compliance for all emergency generators is shown in the calculations below.

Diesel combustion in emergency generators:

For engines less than 600 HP:

AP-42 Table 3.3-1 indicates potential emissions of 0.29 lb SO₂/MMBtu. Using an F factor of 10,320 wscf/MMBtu (see NSPS Appendix A, Method 19, Table 19-1) and a conversion factor of 1.66E-7 lbs/scf per ppm (see NSPS Appendix A, Method 19), the potential emissions convert to 169 ppmv SO₂. This is less than the limit imposed by the rule of 500 ppmv.

For engines greater than 600 HP:

AP-42 Table 3.4-1 indicates potential emissions of $1.01*S$ lb SO₂/MMBtu, where S is the sulfur content. Using an F factor of 10,320 wscf/MMBtu (see NSPS Appendix A, Method 19, Table 19-1) and a conversion factor of 1.66E-7 lbs/scf per ppm (see NSPS Appendix A, Method 19), and a sulfur content of 8,480 ppm the potential emissions convert to 500 ppmv SO₂. Therefore, compliance with the voluntary limitation of 15 ppm assures compliance with the SO₂ emissions limitation.

10 CSR 10-6.261, *Control of Sulfur Dioxide Emissions*

Natural gas units are exempted per 6.260(1)(A)2. and 6.261(1)(A). All other units are subject to the plant wide permit condition which is more stringent than the limitations imposed by this rule.

Therefore, this installation meets exemption (1)(C) and this rule does not apply.

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

This regulation applies to all sources of visible emissions. This regulation does not apply to the emergency generators per 6.220(1)(A). The pet food research operations and other units only combust natural gas and meet the exemption in 6.220(1)(L).

Boiler #1, EP-1, was constructed on 10/31/1963 and meets the definition of existing source. The potential particulate matter emissions from this source are 0.19 lb PM/hour. Therefore this source qualifies for the exemption found under 6.220(3)(A) and has a 40% opacity limitation. The remaining units are all subject to the 20% limitation, as it is the same for existing and new sources. This permit contains recordkeeping requirements for the dual fuel fired unit. The remaining units have potential to emit less than 0.5 lb of particulate an hour, are not continuously operated, and are not expected to emit opacity except during SSM events.

10 CSR 6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

This regulation applies to any operation, process, or activity that emits particulate matter. The boilers and emergency generators are not subject to this regulation as they do not meet the definition of process weight. The various pet food research units all have uncontrolled potential emissions less than 0.5 lb/hr and are therefore exempt per 6.400(1)(B)12. The paint booth is controlled by a control system that is at least 90% efficient and is required by a federally enforceable construction permit. This meets exemption 6.400(1)(B)15. The sandblasting, welding, and machining operations all meet exemption 6.400(1)(B)8, as the sandblasting meets exemption (3)(B)6.C and the welding/machining meets exemption (3)(B)5.A of 10 CSR 10-6.061.

Intermediate Operating Permit Voluntary Limitations

1. Plant wide condition PW2-sulfur content of fuel oil

The installation has various construction permits that require the use of #2 diesel fuel oil that has less than 0.5% by weight sulfur content. The most recent Construction Permit, Construction Permit #012012-003 requires less than 0.0015% by weight sulfur content. In the Operating Permit application, the installation indicated that it would use #2 fuel oil with 0.0015% by weight sulfur content in all combustion units that can use #2 fuel oil. This voluntary expansion of the limit imposed by Construction Permit #012012-003 from the boilers to the entire installation was placed in this permit as an installation wide permit condition. Since this is more stringent than the requirements listed in issued construction permits, those fuel oil sulfur content requirements have not been included in this Operating Permit.

2. Plant wide condition PW1-NO_x emission limitation

The installation has voluntarily agreed to a plant wide limitation on NO_x to less than the major source threshold of 100 tons per year. The application requested a limitation of less than 90 tons per year. However, in this operating permit the limit was set to less than 100 tons per year to provide greater operational flexibility and maintain synthetic minor status. This limitation applies to all NO_x sources at the installation. At permit issuance, the NO_x sources consist of the boilers, emergency generators, and various other combustion units including the pet food research dryers and water heaters. On the recordkeeping attachment, these units were streamlined into three categories: boilers, engines, and other. The NO_x emissions are calculated based on the category and fuel type.

3. Equipment Listed in the application that has since been removed from site:

EQ #	Description
None	2 Learning Center (CBC Res) Building boilers
EP-13	Credit Union Building emergency generator
None	Diesel fuel storage tank for Credit Union Building emergency generator

PRT-4	Davidson Sheet-Fed Printing Press, one color, installed 2001
PRT-1	Encomatic Negative Plate Processor, installed 2001
PRT-2	Ultra Plus Flip Top Plate Maker, installed 2001
PRT-3	Itek Paper Plate Maker, installed 2001
PRT-5	Ryobi Sheet-Fed Printing Press, 2 color, installed 2001
PRT-6 and 6A	2 Multigraphic Sheet-Fed Printing Presses, 2 color, installed 2001

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 APCP a schedule for achieving compliance for that regulation(s).

Response to Public Comments

The draft Intermediate Operating Permit for Nestle Purina PetCare Company was placed on public notice June 9, 2017 for a 30-day comment period. The public notice was published on the Department of Natural Resources' Air Pollution Control Program's web page at: <http://www.dnr.mo.gov/env/apcp/PermitPublicNotices.htm>. Public comments were received from Mr. Mark Smith, EPA Region 7. The comments are addressed in the order in which they appear within the letter(s).

Comment #1: First, the Emission Limitation in Permit Condition PW1 says: "The permittee shall emit less than 100 tons of NO_x in any consecutive 12-month period." As written, this emission limitation may be too vague to be enforceable as a practical matter. This emission limitation appears to provide the opportunity for the permittee to install additional NO_x emitting emission units, which would thereby make this emission limitation a "synthetic minor plant wide applicable limit (PAL)." EPA suggests MDNR either list the applicable on-site emission units in this permit condition or consider modifying the emission limitation to specifically state that the "permittee shall emit less than 100 tons of NO_x in any consecutive 12- month period from the current installation."

Response to Comment #1: The proposed language has been incorporated into the permit condition to clarify the limitation applies to the current installation.

Comment #2: Second, Permit Condition 1 incorporates the applicable requirements from 40 CFR part 63, Subpart JJJJJJ-*National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boiler Area Sources*. 10 CSR 10-6.075 indicates that MDNR relies on EPA for compliance assurance for the area sources of hazardous air pollutants (HAP). Therefore, EPA believes that compliance reports associated with Permit Condition 1 should be submitted to the Missouri Air Compliance Coordinator at Region 7, with copies to MDNR as necessary.

Response to Comment #2: A third requirement has been added under the Reporting section of this permit condition to indicate all reports and certifications required under the permit condition must be submitted to both EPA and MDNR.

Comment #3: Third, Monitoring Requirement 2., in Permit Condition 2 says: "For all other units: a.) none, see Statement of Basis." To the public reviewer, this might be looked at as a confusing requirement and EPA encourages MDNR consider adding some clarification to the explanation of Monitoring Requirement 2.

Response to Comment #3: The wording has been changed to provide clarification that all units except Boilers #1 through 3 are not required to perform monitoring to demonstrate compliance.

Comment #4: Fourth, Permit Condition 8 incorporates applicable requirements from 40 CFR part 60, Subpart IIII- Standards of Performance for Stationary Compression Ignition Internal Combustion Engines for emission units Insig-9 and Insig-11. Reporting Requirement 1 begins by saying "Starting with the model years in table 5 to this subpart," Permit conditions do not normally have subparts and in several of the other permit conditions, in this draft operating permit, MDNR has included appropriate excerpted portions of applicable tables. EPA suggests

MDNR consider including the appropriate portion of table 5 of 40 CFR part 63, Subpart IIII in Permit Condition 8.

Response to Comment #4: The language “Starting with the model years in table 5 to this subpart” has been removed from the permit condition. Both engines are subject to this condition, so clarification of the model years in Table 5 is not necessary.

Comment #5: Fifth, Emission Limitation in Permit Condition 9 indicates "the emissions from the generator engine (EP-12) shall not exceed the applicable limits in 40 CFR part 60, Subpart IIII." Permit Condition 10 incorporates the applicable requirements from 40 CFR part 60, Subpart IIII for EP-12. So it would seem to be an appropriate opportunity for MDNR to reference Permit Condition 10 in the emission limitations of Permit Condition 9.

Response to Comment #5: A reference to Permit Condition 10 has been added to Permit Condition 9, Emission Limitation.

Comment #6: Sixth, Permit Condition 11 establishes limits emission unit Insig-10 of 4.0 g/KW-hr for NHMC + NO_x and 0.20 g/KW-hr for PM, however, there does not appear to be a requirement for the permittee to monitor for compliance verification. EPA recommends MDNR consider providing an explanation as to why the permittee is not required to monitor for NHMC+NO_x and PM.

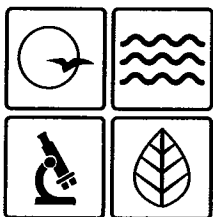
Response to Comment #6: Permit Condition 11 incorporates the applicable requirements of 40 CFR part 60 Subpart IIII. The subpart requires the permittee to purchase an engine certified to the emission standards, to install and configure the engine according to the manufacturer’s emission related instructions, and to operate and maintain the engine according the manufacturer’s emission related instructions. Imposing additional requirements upon the permittee would not yield further guarantees of compliance. Therefore no changes were made to the permit in response to this comment.

Comment #7: Seventh, in the Construction Permit History portion of the Statement of Basis, MDNR states that "in many instances the city (St. Louis) permits would reiterate the maximum hourly design rates and other construction design parameters as special conditions of the construction permits." MDNR goes on to say "these special conditions have not been carried into this operating permit for two reasons: first, by law, the applicant is required to construct according to the application submitted as part of the permitting process; and second, the equipment is not capable of exceeding the design capacity; therefore, a limit is not necessary." A better test may be whether the construction permit means to distinguish between "descriptive" and "enforceable" elements of the construction permit. For example, if the maximum design rate is listed in the installation description or project description to the construction permit as to what is being permitted, then an argument can be made that the design rate is not an enforceable element of the permit. However, if the design rate is found under "Conditions" portion of the construction permit, then it is likely enforceable. Additionally, if the City of St. Louis Division of Air Pollution Control issued construction permits, as an approved and authorized agent of the Missouri Department of Resources, then EPA believes MDNR should consider the special conditions of these construction permits issued by the City of St. Louis as applicable permittee requirements and these special conditions may be required to be included in this operating permit.

Response to Comment #7: The cited language has been removed. The operating permit contains the special conditions from the construction permits issued by the City of St. Louis, as described in the Construction Permit History section of the Statement of Basis.

Comment #8: Finally, 10 CSR 10-6.065(5)(F)l requires MDNR to provide notice to affected states, when a draft permit action goes on public notice. It is unclear, from the permit record available for public review, whether or not MDNR has provided appropriate notification to the affected states.

Response to Comment #8: As required by 10 CSR 10-6.065(5)(F)l, affected states notice was provided to Mr. Brad Frost of the Illinois Environmental Protection Agency via email dated June 9, 2017.



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

JUL 24 2017

Mr. Gene McCoskey
Nestle Purina PetCare Company
901 Chouteau Avenue
St. Louis, MO 63164

Re: Nestle Purina PetCare Company, 510-1761
Permit Number: OP2017-059

Dear Mr. McCoskey;

Enclosed with this letter is your intermediate 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.

This permit may include requirements with which you may not be familiar. If you would like the department to meet with you to discuss how to understand and satisfy the requirements contained in this permit, an appointment referred to as a Compliance Assistance Visit (CAV) can be set up with you. To request a CAV, please contact your local regional office or fill out an online request. The regional office contact information can be found at <http://dnr.mo.gov/regions/>. The online CAV request can be found at <http://dnr.mo.gov/cav/compliance.htm>.

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 (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please contact the Air Pollution Control Program (APCP) at (573) 751-4817, or you may write to the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

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

MJS:nwj

Enclosures

c: PAMS File: 2006-05-064

