

Missouri Department of

dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

SEP 09 2019

Ms. Joan DeMeyer
Senior EHS Specialist
Nike IHM, Inc.
8 Research Park Drive
St. Charles, MO 63304

RE: New Source Review Permit Amendment - Permit Number: 102018-005A
Project Number: 2019-02-010; Installation Number: 183-5015

Dear Ms. DeMeyer:

This amendment is in response to your plans to add an extrusion line (EP-25) and an emergency generator (EP-26) to your facility. Following the completion of permit 102018-005, Nike IHM, Inc. notified the Air Pollution Control Program that these two additional emission units would be installed at the facility. Due to the proximity of the projects, the addition of the new equipment (EP-25 and EP-26) discussed above is considered part of the same project as the installation of the equipment in permit 102018-005.

Permit 102018-005 describes a Schwing VacuClean 154 (EP-22) and two InnovClean ECO-3 systems (EP-23 and EP-24). This amendment adds an extrusion line (EP-25) and an emergency generator (EP-26). The extrusion line is equipped with a loading device, 2 material dryers, and 2 extruders. The maximum hourly design rate of the line is 800 pounds of plastic extruded per hour. The loading system pneumatically transfers solid plastic pellets to a drying hopper mounted above the dryer. The pellets are dried and heated to a uniform temperature and then sent to the extruder. The extruder melts the pellets into a homogeneous melt and pumps the melt through a die. The melt is cooled and cut to shape.

Emissions from pellet handling and the dryer were calculated using an uncontrolled emission factor for product handling found in AP-42 Compilation of Air Pollutant Emission Factors, Volume 1: Stationary Point and Area Sources, Fifth Edition, Section 6.6.2 "Poly (ethylene terephthalate)." Emissions from the extruder were calculated using a document from the Michigan Department of Environmental Quality entitled "Emission Calculation Fact Sheet: Plastic Production and Products Manufacturing."

In addition to the new extrusion line, Nike IHM, Inc. plans to install a 2018 Kohler 200REOZJF 60Hz diesel industrial generator set with a 315 HP John Deere, 6068HFG85 engine (EP-26). Emergency generators that meet the requirements of 10 CSR 10-6.061 *Construction Permit Exemptions* (3)(A)BB. may be exempt from construction permitting, however, since the emergency generator is part of a larger project the potential to emit from the engine is included



Recycled paper

in the project emission totals to determine permit applicability. Project emissions are such that a permit is required. The emergency generator will be subject to NSPS Subpart IIII, for "Stationary Compression Ignition Internal Combustion Engines," as it is a stationary compression ignition internal combustion engine which was manufactured after April 1, 2006 and which will be installed after July 11, 2005. This unit will also be subject to MACT ZZZZ.

Potential emissions from the emergency generator (EP-26) was calculated using emission factors obtained from AP-42 Section 3.3 Gasoline and Diesel Industrial Engines, October 1996. Annual potential emissions were calculated based on 500 hours per year of operation. The 500 hours per year operation was obtained from the EPA document, Calculating Potential to Emit (PTE) for Emergency Generators, September 1995.

The project changes discussed in this amendment do not affect the type of construction permit that was issued for permit 102018-005. Please attach this letter and attached special conditions to the existing permit, permit 102018-005. An updated emissions summary for the project is listed in the new Table 1. Existing potential emissions were taken from permit 072009-006. Existing actual emissions were taken from the installation's 2017 EIQ. Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year), except for the emergency generator (EP-26) which is for operation at 500 hours per year.

Table 1: Emissions Summary (tpy)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Installation Potential Emissions	Existing Actual Emissions (2017 EIQ)	Potential Emissions of the Project
PM	25.0	N/D	N/D	8.77
PM ₁₀	15.0	0.012	0.002	8.77
PM _{2.5}	10.0	N/D	0.002	8.77
SO _x	40.0	N/D	N/D	0.0008
NO _x	40.0	N/D	N/D	29.11
VOC	40.0	0.066	0.0539	3.05
CO	100.0	0.0075	N/D	0.45
HAPs	10.0/25.0	N/D	0.0089	0.0025

N/D = Not Determined

If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the Administrative Hearing Commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the Administrative Hearing Commission within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on

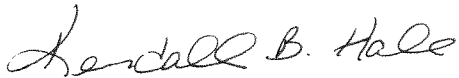
Ms. Joan DeMeyer
Page Three

the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.ao.mo.gov/ahc.

If you have any questions regarding this amendment, please do not hesitate to contact Chad Stephenson, at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kendall B. Hale
Permits Section Chief

KBH:csd

Enclosures

c: St. Louis Regional Office
PAMS File: 2019-02-010

Page No.	4
Permit No.	102018-005A
Project No.	2019-02-010

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

Nike IHM, Inc.
St. Charles County, S33 & 34, T48N, R3E

1. Emergency Generator Requirements
 - A. The individual operating hours of each of the emergency generator (EP-26) shall not exceed 500 hours annually. The emergency generator shall be equipped with a non-resettable running time meter. The emergency generator shall only be operated during emergencies to provide back-up power when electric power from public utilities is interrupted, for demand response, and for maintenance and testing.
 - B. Attachment A or equivalent forms, such as electronic forms, approved by the Air Pollution Control Program shall be used to demonstrate compliance with the operating hour restrictions in Special Condition 2.A.
 - C. Nike IHM, Inc. shall combust only fuel oil 1&2 (ASTM D396), or diesel fuel 1&2 (ASTM D975) in the emergency generator (EP-25).
 - D. Oil or diesel fuel shall not exceed 0.0015% weight sulfur (15 parts per million weight).
 - E. Nike IHM, Inc. shall obtain records from the fuel supplier for each oil or diesel fuel shipment that show sulfur content in weight percent or parts per million.

Attachment A – Emergency Generator Hours of Operation Compliance Worksheet

Nike IHM, Inc.
 St. Charles County, S33&34, T48N, R3E
 Project Number: 2019-02-010
 Installation ID Number: 183-5015
 Permit Number:

This sheet covers the period from _____ to _____.
 (month, year) (month, year)

Date (MM, YYYY)	EP-26 Kohler 200REOZJF Emergency Generator Hours of Operation

Instructions:
 (1) Record the hours of operation for the emergency generator for the current month.
 (2) Sum the twelve individual monthly hours of operation for the emergency generator.
 A total not exceeding 500 hours per generator indicates compliance.

