



Missouri Department of Natural Resources
Air Pollution Control Program

PART 70 PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth herein.

Operating Permit Number: OP2010-089
Expiration Date: AUG 02 2015
Installation ID: 031-0072
Project Number: 2006-01-104

Installation Name and Address

Nordenia U.S.A., Inc.
14591 State Highway 177
Jackson, MO 63755
Cape Girardeau County

Parent Company's Name and Address

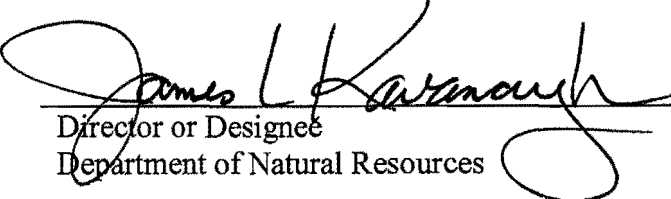
Nordenia International AG
Airport Center am FMO
Greven Germany, 48268

Installation Description:

Nordenia U.S.A., Inc. operates a rotogravure printing operation and a polyethylene bag manufacturing facility in Jackson, Missouri. Final printed products include films, bags and flexible packaging. Industrial processes include rotogravure printing, blown film extrusion and converting, electroplating and laminating.

AUG 03 2010

Effective Date



Director or Designee
Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

Nordenia U.S.A., Inc. operates a rotogravure printing operation and a polyethylene bag manufacturing facility in Jackson, Missouri. Final printed products include films, bags and flexible packaging. Industrial processes include rotogravure printing, blown film extrusion and converting, electroplating and laminating.

Reported Air Pollutant Emissions, tons per year								
Year	Particulate Matter ≤ Ten Microns (PM-10)	Sulfur Oxides (SO _x)	Nitrogen Oxides (NO _x)	Volatile Organic Compound s(VOC)	Carbon Monoxide (CO)	Lead (Pb)	Hazardous Air Pollutants (HAPs)	Particulate Matter ≤ 2.5 Microns (PM-2.5)
2008	0.57	--	--	93.84	--	--	0.02	0.57
2007	0.62	--	--	97.93	--	--	--	0.62
2006	--	--	--	90.38	--	--	--	--
2005	0.03	0.09	1.25	88.74	0.1700	--	--	0.03
2004	0.64	0.05	3.62	112.76	0.6256	--	--	0.64

EMISSION UNITS WITH LIMITATIONS

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

Emission Unit #	Description of Emission Unit	2008 EIQ EP#
EU0010	Rotogravure Press 2201	ATM 4-1
EU0020	Rotogravure Press 2202	ATM 4-2
EU0030	Rotogravure Press 2203	ATM 4-3
EU0040	Rotogravure Press 2204	ATM 28
EU0050	Rotogravure Press 2205	NA
EU0060	Laminator 2253	ATM 29
EU0070	Chrome Electroplating	ATM 20
EU0080	Nickel Electroplating	ATM 18

EMISSION UNITS WITHOUT LIMITATIONS

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

<u>Description of Emission Source</u>	<u>2008 EIQ EP#</u>
10,000-gallon storage tank (N-propyl acetate)	ATM 1
10,000-gallon storage tank (solvent blend)	ATM 2
Ink mixing and storage, 275-gallon tote containers	ATM 5
Hot water heater, 1.6 MMBtu/hr, propane-fired	ATM 6
Hot water heater, 9.96 MMBtu/hr, propane-fired	ATM 7
Cylinder preparation - degreasing	ATM 17
Cylinder preparation - copper plating	ATM 19
Cylinder preparation - dechrome	ATM 21
Emergency diesel water pumps (2)	ATM 22
Corona treater ozone exhaust	ATM 23
Polyethylene pellet silos (16)	ATM 24
Blown film extrusion lines (6)	ATM 25
Bag machines that heat seal polyethylene film (11)	ATM 26
PRI parts washing system (incorporated ATM 9, 13, and 15)	ATM 27
10,000-gallon storage tank (ethyl acetate)	ATM 32
10,000-gallon storage tank (waste ink and solvent)	ATM 33
Hot water heater, 3.3 MMBtu/hr, propane-fired	ATM 34
Copper Engraving	ATM 30
2 Laminators	NA

DOCUMENTS INCORPORATED BY REFERENCE

These documents have been incorporated by reference into this permit.

- 1) Missouri Department of Natural Resources Construction Permit No. 052008-002, issued May 27, 2008
- 2) Compliance Assurance Monitoring (CAM) Plan for Adwest 25 RTO (CD-05) for VOC Control
- 3) Compliance Assurance Monitoring (CAM) Plan for Adwest 55 RTO (CD-06) for VOC Control
- 4) Chromium Electroplating Operation and Maintenance Plan

II. Plant Wide Emission Limitations

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

PERMIT CONDITION PW001
 10 CSR 10-6.060 Construction Permits Required
 MDNR Construction Permit No. 052005-008, Issued May 27, 2008

Emission Limitations:

- 1) The conditions of Construction Permit No. 052008-002 supersede all special conditions found in construction permits previously issued by the Air Pollution Control Program (Permit Numbers 1289-003, 0690-015, 1293-014, 0794-013, 0795-010, 102000-026, 042006-005 and 042006-005A). [CP No. 052008-002, Special Condition No. 1]
- 2) Nordenia U.S.A., Inc. shall emit less than 250 tons of Volatile Organic Compounds (VOCs) from the *entire installation* in any consecutive 12-month period. For the purpose of this special condition, *entire installation* shall mean all source operations including activities that result in fugitive emissions located at Nordenia, U.S.A., Inc.'s 14591 State Highway 177 property, as such source operations existed in September 2007, with the modifications described in Nordenia, U.S.A., Inc.'s September 2007 construction permit application. The installation includes the emission points and/or emission units listed below: [CP No. 052008-002, Special Condition No. 2.A]

EU ID #	EIQ Reference Emission Point	Emission Unit Description
EU0010	ATM 4-1	Rotogravure Press 2201. Emissions routed to thermal oxidizer(s).
EU0020	ATM 4-2	Rotogravure Press 2202. Emissions routed to thermal oxidizer(s).
EU0030	ATM 4-3	Rotogravure Press 2203. Emissions routed to thermal oxidizer(s).
EU0040	ATM 28	Rotogravure Press 2204. Emissions routed to thermal oxidizer(s).
EU0050	ATM 31	Rotogravure Press 2205. Emissions routed to thermal oxidizer(s).
EU0060	ATM 29	Laminator 2253.
EU0070	ATM 20	Chrome Electroplating
EU0080	ATM 18	Nickel Electroplating
NA	ATM 1	10,000 gallon storage tank (N-propyl acetate)
NA	ATM 2	10,000 gallon storage tank (solvent blend)
NA	ATM 5	Ink mixing and storage, 275 gallon tote containers
NA	ATM 6	Hot water heater, 1.6 MMBTU/hr propane
NA	ATM 7	Hot water heater, 9.96 MMBTU/hr propane
NA	ATM 9	PRI distillation units (2). Emissions included with ATM-27.
NA	ATM 13	PRI dirty solvent tanks. One 500-gallon tank and one 1,000-gallon tank. Emissions included with ATM-27.
NA	ATM 15	PRI clean solvent tanks. Two 500-gallon tanks and one 1,000-gallon tank. Emissions included with ATM-27.
NA	ATM 17	Cylinder preparation - degreasing, toluene & methanol
NA	ATM 19	Cylinder preparation - copper plating
NA	ATM 21	Cylinder preparation - dechrome

EU ID #	EIQ Reference Emission Point	Emission Unit Description
NA	ATM 22	Emergency diesel water pumps (2)
NA	ATM 23	Corona treater ozone exhaust
NA	ATM 24	Polyethylene Pellet Silos (16)
NA	ATM 25	Blown film extrusion lines (6)
NA	ATM 26	Bag machines that heat seal polyethylene film (6)
NA	ATM 27	PRI Parts Washing System (incorporating ATM 9, ATM 13 and ATM 15)
NA	ATM 32	10,000 gallon storage tank (ethyl acetate)
NA	ATM 33	10,000 gallon storage tank (ink and solvent)
NA	ATM 34	Hot Water Heater, 3.3 MMBTU/hr propane

Monitoring/Recordkeeping:

Attachment A or an equivalent form approved by the Air Pollution Control Program shall be used to demonstrate compliance with *Emission Limitation No. 2*. Nordenia U.S.A., Inc. shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) and purchasing/inventory records sufficient to substantiate VOC usage figures for all materials used in the equipment associated with ATM 1, ATM 2, ATM 4, ATM 5, ATM 17, ATM 27, ATM 28, ATM 29 and ATM 31. [CP No. 052008-002, Special Condition No. 2.B]

Reporting:

Nordenia U.S.A., Inc. shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Attachment A indicate that the source exceeds *Emission Limitation No. 2*. [CP No. 052008-002, Special Condition No. 2.C]

III. Emission Unit Specific Emission Limitations

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

EU0010 – ROTOGRAVURE PRESS 2201 EU0020 – ROTOGRAVURE PRESS 2202 EU0030 – ROTOGRAVURE PRESS 2203 EU0040 – ROTOGRAVURE PRESS 2204 EU0050 – ROTOGRAVURE PRESS 2205 EU0060 – LAMINATOR 2253			
Emission Unit	Description	Manufacturer/ Model #	2008 EIQ Reference #
EU0010	Rotogravure Press 2201: rotogravure printing press; construction date 1990; connected to Adwest regenerative thermal oxidizers (CD-05 and CD-06)	Windmoller Holscher/ 36805	ATM 4-1
EU0020	Rotogravure Press 2202: rotogravure printing press; construction date 1991; connected to Adwest regenerative thermal oxidizers (CD-05 and CD-06)	Windmoller Holscher/ 36825	ATM 4-2
EU0030	Rotogravure Press 2203: rotogravure printing press; construction date 1994; connected to Adwest regenerative thermal oxidizers (CD-05 and CD-06)	Windmoller Holscher/ 39537	ATM 4-3
EU0040	Rotogravure Press 2204: rotogravure printing press; construction date 2001; connected to Adwest regenerative thermal oxidizers (CD-05 and CD-06)	Windmoller Holscher/ 1043041	ATM 28
EU0050	Rotogravure Press 2205: rotogravure printing press; construction date 2008; connected to Adwest regenerative thermal oxidizers (CD-05 and CD-06)	Shaanxi Bieren/ FRB120	NA
EU0060	Laminator 2253: 1.7 meter laminator; applies adhesive to polyethylene film; construction date 2006; connected to Adwest regenerative thermal oxidizers (CD-05 and CD-06) when utilizing solvent based adhesives or ink	Nordmeccanica /1700/1000	ATM 29

PERMIT CONDITION (EU0010 through EU0060)-001
 10 CSR 10-6.060 Construction Permits Required
 MDNR Construction Permit No. 052005-008, Issued May 27, 2008
 40 CFR Part 64 Compliance Assurance Monitoring

Note: Compliance Assurance Monitoring (CAM) applies to these units; this permit condition incorporates parts of 40 CFR Part 64 and, through that, parts of 40 CFR Part 60. Where conflicts arise between these documents and 40 CFR Part 60, the approved conditions of the CAM plan (included in this permit condition) govern.

Operational Specifications:

- 1) Emissions from Rotogravure Presses 2201, 2202, 2203, 2204 and 2205 (EU0010 through EU0050) shall be vented to one or both of the regenerative thermal oxidizers whenever the presses are in operation. [CP No. 052008-002, Special Condition No. 3.A]
- 2) When Laminator 2253 (EU0060) is utilizing solvent-based adhesives or ink, the emissions from this process shall be vented to one or both of the regenerative thermal oxidizers. [CP No. 052008-002, Special Condition No. 3.A]
- 3) The regenerative thermal oxidizers shall be operated in accordance with manufacturer's specifications. The Adwest regenerative thermal oxidizers (CD-05 and CD-06) shall be operated at a temperature of at least 1500° Fahrenheit and shall be equipped with a continuous temperature monitoring system. The temperature monitoring system shall alert the operator whenever the oxidizer temperature drops below 1500° Fahrenheit. [CP No. 052008-002, Special Condition No. 3.A]
- 4) System curves shall be developed to establish the relationship between alternating current frequency delivered to fan motor(s) and gas flow rate through the thermal oxidizers. Nordenia U.S.A., Inc. shall have a process control mechanism in place on the thermal oxidizers such that when the primary thermal oxidizer exceeds 90% of its capacity (as indicated by the system curve and alternating current reading), the secondary thermal oxidizer must come on-line and up to temperature prior to the start-up of additional VOC-generating process equipment. [CP No. 052008-002, Special Condition No. 3.B]

Testing:

- 1) Nordenia U.S.A., Inc. shall conduct performance testing for both of the Adwest regenerative thermal oxidizers (CD-05 and CD-06) to determine VOC destruction efficiency. [CP No. 052008-002, Special Condition No. 4.A]
- 2) Performance tests shall be performed within 60 days of achieving the maximum production rate for Rotogravure Press 2205 (EU0050), but no later than 180 days after initial startup of Rotogravure Press 2205 (EU0050). VOC destruction efficiency testing for both of the thermal oxidizers shall be repeated at least once every five (5) years. [CP No. 052008-002, Special Condition No. 4.B]
- 3) *Adjustment of Combined Capture and Control Efficiency for VOCs:* With regard to the VOC emissions limitation and associated recordkeeping, the current (as of September 2009) destruction efficiency for Adwest 25 RTO (CD-05) is 99.21% and the destruction efficiency for Adwest 55 RTO (CD-06) is 99.15%. Capture efficiency will remain at 99.2 %, as demonstrated by the January 2006 testing, unless additional capture efficiency testing is conducted. Nordenia U.S.A. may voluntarily elect to conduct additional capture efficiency testing, or the Air Pollution Control Program may require additional capture efficiency testing if a finding is made that the characteristics of the building enclosure vary significantly from the test conditions of January 2006. [CP No. 052008-002, Special Condition No. 5]

Monitoring:

- 1) The permittee is subject to the CAM plans contained in Attachments B and C. The CAM monitoring requirements for these units shall be as specified in Table 1.

TABLE 1. CAM Compliance at Nordenia U. S. A.

Requirement	Parameter
I. Indicator Measurement Approach	Combustion chamber temperature when chamber temperature is below indicator range. The combustion chamber temperature is measured continuously using a thermocouple in the combustion chamber.
II. Indicator Range	The manufacturer recommends a combustion chamber temperature of 1500 °F. The process control system operates such that, on startup, the printing presses cannot begin operating until the RTO combustion chamber temperature has been greater than or equal to 1500 °F for at least 10 minutes. The printing presses will automatically shut down if the RTO combustion chamber temperature falls below 1500 °F.
III. Performance Criteria	
A. Data Representativeness	The monitoring system consists of a thermocouple in the combustion chamber with a digital readout and electronic data storage. The digital readout provides continuous combustion chamber temperature readings and the data is electronically recorded at least every 15 minutes.
B. Verification of Operational Status	The equipment has been installed and calibrated according to the manufacturer's specifications.
C. QA/QC Practices and Criteria	The thermocouple will be changed every 18 months and calibrated according to the manufacturer's specifications.
D. Monitoring Frequency and Data Collection Procedures	The temperature of the combustion chamber is continuously displayed and recorded.

- 2) Nordenia U.S.A., Inc. shall continuously monitor and record the following process parameters to ensure proper operation of the VOC control devices: [CP No. 052008-002, Special Condition No. 3.C]
 - a) Combustion zone and bed temperatures for the thermal oxidizers; and,
 - b) Alternating current frequency delivered to fan motor(s) for fans that are used to move VOC-laden process gases through the thermal oxidizers.
- 3) Nordenia U.S.A., Inc. shall monitor and record the pressure drop from ambient air to inside the printing room at least once per operating day to verify effective capture of VOCs from the printing presses and laminator. [CP No. 052008-002, Special Condition No. 3.D]
- 4) *Proper Maintenance*: At all times, the permittee shall maintain the monitoring, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]

- 5) *Continued operation*: Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities, the permittee shall collect data at all required intervals when the emission units are operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of part 64. The permittee shall use all the data collected during all other periods in assessing the operation of the control devices and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. [§64.7(c)]
- 6) *Response to exceedances*: [§64.7(d)]
 - a) Upon detecting an exceedance, the permittee shall restore operation of the emission unit(s) (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable. [§64.7(d)(1)]
 - b) Determination of whether the permittee has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process. [§64.7(d)(2)]

Recordkeeping:

- 1) Nordenia U.S.A., Inc. shall maintain records of the following process parameters:
 - a) Combustion zone and bed temperatures for the thermal oxidizers;
 - b) Alternating current frequency delivered to fan motor(s) for fans that are used to move VOC-laden process gases through the thermal oxidizers; and,
 - c) Daily pressure drop from ambient air to inside the printing room.
- 2) Nordenia U.S.A., Inc. shall maintain an operating and maintenance log for the thermal oxidizers and associated equipment (such as fan motors), which shall include the following: [CP No. 052008-002, Special Condition No. 3.E]
 - a) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - b) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 3) *General CAM Recordkeeping Requirements*: The permittee shall comply with the recordkeeping requirements specified in §70.6(a)(3)(ii). The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to §64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under part 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). [§64.9(b)(1)]
- 4) Instead of paper records, the permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, instead of paper provided that the use

of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements. [§64.9(b)(2)]

- 5) All records shall be maintained for five (5) years.
- 6) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

Reporting:

- 1) The performance test date(s) shall be pre-arranged with the Air Pollution Control Program a minimum of 30 days prior to the proposed test date so that a pre-test meeting may be arranged if necessary, and to assure that the test date is acceptable for an observer from the Air Pollution Control Program to be present. A proposed test plan shall be submitted to the Air Pollution Control Program a minimum of 30 days prior to the proposed test date. The test plan must be approved by the Air Pollution Control Program prior to the test date. [CP No. 052008-002, Special Condition No. 4.C]
- 2) Two (2) copies of a written report of the performance test results shall be submitted to the Director of the Air Pollution Control Program within 30 days of completion of any required testing. The report must include legible copies of the raw data sheets, analytical instrument laboratory data, and complete sample calculations from the required EPA method for at least one (1) sample run. [CP No. 052008-002, Special Condition No. 4.D]
- 3) *General CAM Reporting Requirements:* The permittee shall submit semi-annual monitoring certified by a responsible official using the semi-annual monitoring report and annual compliance certification to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as required by 10 CSR 10-6.065(6)(C)1.C.(III). The report shall include, at a minimum, the following information, as applicable: [§64.9(a)(1)]
 - a) All instances of deviations from permit requirements must be clearly identified; [§70.6(a)(3)(iii)(A)]
 - b) Prompt reporting of deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken; [§70.6(a)(3)(iii)(B)]
 - c) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken; [§64.9(a)(2)(i)]
 - d) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and [§64.9(a)(2)(ii)]
 - e) A description of the actions taken to implement a QIP during the reporting period as specified in §64.8. Upon completion of a QIP, the permittee shall include in the next summary report documentation that the implementation of the plan has been completed and reduced the likelihood of similar levels of excursions or exceedances occurring. [§64.9(a)(2)(iii)]
- 4) *Documentation of need for improved monitoring:* If the permittee identifies a failure to achieve compliance with the emission limitation, for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the Air Pollution Control Program and, if necessary, submit a proposed modification to the part 70 permit to address the necessary monitoring changes.

Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters. [§64.7(e)]

EU0070 – CHROME ELECTROPLATING			
Emission Unit	Description	Manufacturer/ Model #	2008 EIQ Reference #
EU0070	Chrome Electroplating: chrome plating for cylinder preparation; construction date 1991; MHDR 5,000 amp/hr; connected to fiber-bed mist eliminator	Saueressig/ 1919559	ATM 20

PERMIT CONDITION EU0070-001			
10 CSR 10-6.075 Maximum Achievable Control Regulations			
40 CFR Part 63 Subpart A General Provisions and Subpart N National Emission Standards for Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks			

Note: This permit condition include the sections of subpart N that apply to existing hard chromium electroplating tanks that are located at a small, hard chromium electroplating facility and utilize a fiber-bed mist eliminator.

Emissions Limitations:

- 1) The emission limitations in this permit condition apply during tank operation as defined in §63.341, and during periods of startup and shutdown as these are routine occurrences for affected sources subject to subpart N. The emission limitations do not apply during periods of malfunction, but the work practice standards that address operation and maintenance and that are required by §63.342(f) must be followed during malfunctions. [§63.342(b)(1)]
- 2) The permittee shall control chromium emissions discharged to the atmosphere from the affected source by not allowing the concentration of total chromium in the exhaust gas stream discharged to the atmosphere to exceed 0.03 mg/dscm (1.3×10^{-5} gr/dscf) [§63.342(c)(1)(ii)]

Operational Specifications:

- 1) *Operation and maintenance practices:* The permittee is subject to these operation and maintenance practices: [§63.342(f)]
 - a) At all times, including periods of startup, shutdown, and malfunction, owners or operators shall operate and maintain any affected source, including associated air pollution control devices and monitoring equipment, in a manner consistent with good air pollution control practices. [§63.342(f)(1)(i)]
 - b) Malfunctions shall be corrected as soon as practicable after their occurrence. [§63.342(f)(1)(ii)]
 - c) Operation and maintenance requirements established pursuant to Section 112 of the Act are enforceable independent of emissions limitations or other requirements in relevant standards. [§63.342(f)(1)(iii)]
- 2) Determination of whether acceptable 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 the operation and maintenance plan, procedures, and records; and inspection of the source. [§63.342(f)(2)(i)]
- 3) Based on the results of a determination made under §63.342(f)(2)(i), the Director may require that the permittee make changes to the operation and maintenance plan required by §63.342(f)(3). Revisions may be required if the Director finds that the plan: [§63.342(f)(2)(ii)]

-
- a) Does not address a malfunction that has occurred; [§63.342(f)(2)(ii)(A)]
 - b) Fails to provide for the proper operation of the affected source, the air pollution control techniques, or the control system and process monitoring equipment during a malfunction in a manner consistent with good air pollution control practices; or [§63.342(f)(2)(ii)(B)]
 - c) Does not provide adequate procedures for correcting malfunctioning process equipment, air pollution control techniques, or monitoring equipment as quickly as practicable. [§63.342(f)(2)(ii)(C)]
- 4) *Operation and maintenance plan:*
- a) The permittee shall prepare an operation and maintenance plan no later than the compliance date. The operation and maintenance plan is incorporated by reference into this title V permit. The plan shall include the following elements: [§63.342(f)(3)(i)]
 - i) The plan shall specify the operation and maintenance criteria for the affected source, the add-on air pollution control device (if such a device is used to comply with the emission limits), and the process and control system monitoring equipment, and shall include a standardized checklist to document the operation and maintenance of this equipment; [§63.342(f)(3)(i)(A)]
 - ii) The plan shall incorporate the operation and maintenance practices for the selected control device, a fiber-bed mist eliminator, as identified in Table 1 of §63.342 and as follows: [§63.342(f)(3)(i)(B)]
 - (1) Once per quarter, visually inspect fiber-bed unit and prefiltering device to ensure there is proper drainage, no chromic acid buildup in the units, and no evidence of chemical attack on the structural integrity of the devices;
 - (2) Once per quarter, visually inspect ductwork from tank or tanks to the control device to ensure there are no leaks; and
 - (3) Per manufacturer's specifications, perform washdown of fiber elements in accordance with manufacturer's recommendations.
 - iii) The plan shall specify procedures to be followed to ensure that equipment or process malfunctions due to poor maintenance or other preventable conditions do not occur; and [§63.342(f)(3)(i)(D)]
 - iv) The plan shall include a systematic procedure for identifying malfunctions of process equipment, add-on air pollution control devices, and process and control system monitoring equipment and for implementing corrective actions to address such malfunctions. [§63.342(f)(3)(i)(E)]
 - b) If the operation and maintenance plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, the permittee shall revise the operation and maintenance plan within 45 days after such an event occurs. The revised plan shall include procedures for operating and maintaining the process equipment, add-on air pollution control device, or monitoring equipment during similar malfunction events, and a program for corrective action for such events. [§63.342(f)(3)(ii)]
 - c) To satisfy the requirements of §63.342(f)(3), the permittee may use applicable standard operating procedure (SOP) manuals, Occupational Safety and Health Administration (OSHA) plans, or other existing plans, provided the alternative plans meet the requirements of this section. [§63.342(f)(3)(vi)]

Monitoring:

- 1) *Monitoring to demonstrate continuous compliance:* The permittee shall conduct monitoring according to the type of air pollution control technique that is used to comply with the emission limitation. The permittee has opted to demonstrate continuous compliance with a *Fiber-bed mist eliminator*. [§63.343(c)]
 - a) During the initial performance test, the permittee shall determine the outlet chromium concentration using the procedures in §63.344(c), and shall establish as a site-specific operating parameter the pressure drop across the fiber-bed mist eliminator, setting the value that corresponds to compliance with the applicable emission limitation using the procedures in §63.344(d)(5). The permittee may conduct multiple performance tests to establish a range of compliant pressure drop values, or may set as the compliant value the average pressure drop measured over the three test runs of one performance test and accept ± 1 inch of water column from this value as the compliant range. [§63.343(c)(4)(i)]
 - b) The permittee shall monitor and record the pressure drop across the fiber-bed mist eliminator, once each day that any affected source is operating. To be in compliance with the standards, the fiber-bed mist eliminator shall be operated within ± 1 inch of water column of the pressure drop value established during the initial performance test, or shall be operated within the range of compliant values for pressure drop established during multiple performance tests. [§63.343(c)(4)(ii)]

Recordkeeping:

- 1) The permittee shall fulfill all recordkeeping requirements outlined in §63.346 and in the General Provisions to 40 CFR Part 63, according to the applicability of subpart A of part 63 as identified in Table 1 of subpart N. [§63.346(a)]
- 2) The permittee shall maintain the following records for such source: [§63.346(b)]
 - a) Inspection records for the add-on air pollution control device, and monitoring equipment, to document that the inspection and maintenance required by the work practice standards of §63.342(f) and Table 1 of §63.342 have taken place. The record can take the form of a checklist and should identify the device inspected, the date of inspection, a brief description of the working condition of the device during the inspection, and any actions taken to correct deficiencies found during the inspection. [§63.346(b)(1)]
 - b) Records of all maintenance performed on the affected source, the add-on air pollution control device, and monitoring equipment; [§63.346(b)(2)]
 - c) Records of the occurrence, duration, and cause (if known) of each malfunction of process, add-on air pollution control, and monitoring equipment; [§63.346(b)(3)]
 - d) Records of actions taken during periods of malfunction when such actions are inconsistent with the operation and maintenance plan; [§63.346(b)(4)]
 - e) Other records, which may take the form of checklists, necessary to demonstrate consistency with the provisions of the operation and maintenance plan required by §63.342(f)(3); [§63.346(b)(5)]
 - f) Test reports documenting results of all performance tests; [§63.346(b)(6)]
 - g) All measurements as may be necessary to determine the conditions of performance tests, including measurements necessary to determine compliance with the special compliance procedures of §63.344(e); [§63.346(b)(7)]
 - h) Records of monitoring data required by §63.343(c) that are used to demonstrate compliance with the standard including the date and time the data are collected; [§63.346(b)(8)]

- i) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during malfunction of the process, add-on air pollution control, or monitoring equipment; [§63.346(b)(9)]
 - j) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions, as indicated by monitoring data, that occurs during periods other than malfunction of the process, add-on air pollution control, or monitoring equipment; [§63.346(b)(10)]
 - k) The total process operating time of the affected source during the reporting period; [§63.346(b)(11)]
 - l) Records of the actual cumulative rectifier capacity of hard chromium electroplating tanks at a facility expended during each month of the reporting period, and the total capacity expended to date for a reporting period, if the owner or operator is using the actual cumulative rectifier capacity to determine facility size in accordance with §63.342(c)(2); [§63.346(b)(12)]
 - m) Any information demonstrating whether a source is meeting the requirements for a waiver of recordkeeping or reporting requirements, if the source has been granted a waiver under §63.10(f); and [§63.346(b)(15)]
 - n) All documentation supporting the notifications and reports required by §63.9, §63.10, and §63.347. [§63.346(b)(16)]
- 3) All records shall be maintained for a period of 5 years in accordance with §63.10(b)(1) with the following exception. [§63.346(c)]
- a) The permittee shall keep the written *Operation and Maintenance Plan* on record after it is developed to be made available for inspection, upon request, by the Director for the life of the affected source or until the source is no longer subject to the provisions of subpart N. In addition, if the *Operation and Maintenance Plan* is revised, the permittee shall keep previous (i.e., superseded) versions of the operation and maintenance plan on record to be made available for inspection, upon request, by the Director for a period of 5 years after each revision to the plan. [§63.342(f)(3)(v)]
- 4) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

Reporting:

- 1) If actions taken by the permittee during periods of malfunction are inconsistent with the procedures specified in the *Operation and Maintenance Plan* required by §63.342(f)(3)(i), the permittee shall record the actions taken for that event and shall report by phone such actions within 2 working days after commencing actions inconsistent with the plan. This report shall be followed by a letter within 7 working days after the end of the event, unless the permittee makes alternative reporting arrangements, in advance, with the Director. [§63.342(f)(3)(iv)]
- 2) The permittee shall fulfill all reporting requirements outlined in §63.347 and in the General Provisions to 40 CFR Part 63, according to the applicability of subpart A as identified in Table 1 of subpart N. These reports shall be made to the Director. [§63.347(a)]
 - a) Reports required by subpart A of part 63 and §63.347 may be sent by U.S. mail, fax, or by another courier. [§63.347(a)(1)]
 - i) Submittals sent by U.S. mail shall be postmarked on or before the specified date. [§63.347(a)(1)(i)]
 - ii) Submittals sent by other methods shall be received by the Director on or before the specified date. [§63.347(a)(1)(ii)]

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- b) If acceptable to both the Director and the permittee, reports may be submitted on electronic media. [§63.347(a)(2)]
- 3) *Notification of performance test:* The permittee shall notify the Director in writing of his or her intention to conduct a performance test at least 60 calendar days before the test is scheduled to begin to allow the Director to have an observer present during the test. Observation of the performance test by the Director is optional. [§63.347(d)(1)]
- 4) In the event the permittee is unable to conduct the performance test as scheduled, the provisions of §63.7(b)(2) apply. [§63.347(d)(2)]
- 5) *Ongoing compliance status reports for area sources:* The permittee shall prepare a summary report to document the ongoing compliance status of the affected source. The report shall contain the information identified in §63.347(g)(3), shall be completed annually and retained on site, and made available to the Director upon request. The report shall be completed annually except as provided under *Reports of Exceedances*. [§63.347(h)(1)]
- a) *Contents of ongoing compliance status reports:* The owner or operator of an affected source for which compliance monitoring is required in accordance with §63.343(c) shall prepare a summary report to document the ongoing compliance status of the source. The report must contain the following information: [§63.347(g)(3)]
- i) The company name and address of the affected source; [§63.347(g)(3)(i)]
 - ii) An identification of the operating parameter that is monitored for compliance determination, as required by §63.343(c); [§63.347(g)(3)(ii)]
 - iii) The relevant emission limitation for the affected source, and the operating parameter value, or range of values, that correspond to compliance with this emission limitation as specified in the notification of compliance status required by §63.347(e); [§63.347(g)(3)(iii)]
 - iv) The beginning and ending dates of the reporting period; [§63.347(g)(3)(iv)]
 - v) A description of the type of process performed in the affected source; [§63.347(g)(3)(v)]
 - vi) The total operating time of the affected source during the reporting period; [§63.347(g)(3)(vi)]
 - vii) If the affected source is a hard chromium electroplating tank and the owner or operator is limiting the maximum cumulative rectifier capacity in accordance with §63.342(c)(2), the actual cumulative rectifier capacity expended during the reporting period, on a month-by-month basis; [§63.347(g)(3)(vii)]
 - viii) A summary of operating parameter values, including the total duration of excess emissions during the reporting period as indicated by those values, the total duration of excess emissions expressed as a percent of the total source operating time during that reporting period, and a breakdown of the total duration of excess emissions during the reporting period into those that are due to process upsets, control equipment malfunctions, other known causes, and unknown causes; [§63.347(g)(3)(viii)]
 - ix) A certification by a responsible official, as defined in §63.2, that the work practice standards in §63.342(f) were followed in accordance with the operation and maintenance plan for the source; [§63.347(g)(3)(ix)]
 - x) If the operation and maintenance plan required by §63.342(f)(3) was not followed, an explanation of the reasons for not following the provisions, an assessment of whether any excess emission and/or parameter monitoring exceedances are believed to have occurred, and a copy of the report(s) required by §63.342(f)(3)(iv) documenting that the operation and maintenance plan was not followed; [§63.347(g)(3)(x)]
 - xi) A description of any changes in monitoring, processes, or controls since the last reporting period; [§63.347(g)(3)(xi)]

- xii) The name, title, and signature of the responsible official who is certifying the accuracy of the report; and [§63.347(g)(3)(xii)]
 - xiii) The date of the report. [§63.347(g)(3)(xiii)]
- 6) *Reports of exceedances:* If both of the following conditions are met, semiannual reports shall be prepared and submitted to the Director: [§63.347(h)(2)(i)]
 - a) The total duration of excess emissions (as indicated by the monitoring data collected by permittee in accordance with §63.343(c)) is 1 percent or greater of the total operating time for the reporting period; and [§63.347(h)(2)(i)(A)]
 - b) The total duration of malfunctions of the add-on air pollution control device and monitoring equipment is 5 percent or greater of the total operating time. [§63.347(h)(2)(i)(B)]
 - 7) Once the permittee reports an exceedance as defined in §63.347(h)(2)(i), ongoing compliance status reports shall be submitted semiannually until a request to reduce reporting frequency under §63.347(h)(3) is approved. [§63.347(h)(2)(ii)]
 - 8) The Director may determine on a case-by-case basis that the summary report shall be completed more frequently and submitted, or that the annual report shall be submitted instead of being retained on site, if these measures are necessary to accurately assess the compliance status of the source. [§63.347(h)(2)(iii)]
 - 9) *Request to reduce frequency of ongoing compliance status reports:* If the permittee is required to submit ongoing compliance status reports on a semiannual (or more frequent) basis, or is required to submit its annual report instead of retaining it on site, the permittee may reduce the frequency of reporting to annual and/or be allowed to maintain the annual report onsite if all of the following conditions are met: [§63.347(h)(3)(i)]
 - a) For 1 full year (e.g., 2 semiannual or 4 quarterly reporting periods), the ongoing compliance status reports demonstrate that the affected source is in compliance with the relevant emission limit; [§63.347(h)(3)(i)(A)]
 - b) The permittee continues to comply with all applicable recordkeeping and monitoring requirements of subpart A of part 63 and subpart N; and [§63.347(h)(3)(i)(B)]
 - c) The Director does not object to a reduced reporting frequency for the affected source, as provided in §63.347(h)(3)(ii) and (iii). [§63.347(h)(3)(i)(C)]
 - 10) The frequency of submitting ongoing compliance status reports may be reduced only after the permittee notifies the Director in writing of his or her intention to make such a change, and the Director does not object to the intended change. In deciding whether to approve a reduced reporting frequency, the Director may review information concerning the source's previous performance history during the 5-year recordkeeping period prior to the intended change, or the recordkeeping period since the source's compliance date, whichever is shorter. Records subject to review may include performance test results, monitoring data, and evaluations of the permittee's conformance with emission limitations and work practice standards. Such information may be used by the Director to make a judgment about the source's potential for noncompliance in the future. If the Director disapproves the permittee's request to reduce reporting frequency, the Director will notify the permittee in writing within 45 days after receiving notice of the permittee's intention. The notification from the Director to the permittee will specify the grounds on which the disapproval is based. In the absence of a notice of disapproval within 45 days, approval is automatically granted. [§63.347(h)(3)(ii)]
 - 11) As soon as the monitoring data required by §63.343(c) show that the source is not in compliance with the relevant emission limit, the frequency of reporting shall revert to semiannual, and the permittee shall state this exceedance in the ongoing compliance status report for the next reporting

period. After demonstrating ongoing compliance with the relevant emission limit for another full year, the permittee may again request approval from the Director to reduce the reporting frequency as allowed by §63.347(h)(3). [§63.347(h)(3)(iii)]

EU0080 – NICKEL ELECTROPLATING			
Emission Unit	Description	Manufacturer/ Model #	2008 EIQ Reference #
EU0080	Nickel Electroplating; nickel plating for cylinder preparation; Tank 161; construction date 1991; MHDR 1,500 amp/hr	Saueressig/ NA	ATM 18

PERMIT CONDITION EU0080-001			
10 CSR 10-6.075 Maximum Achievable Control Regulations			
40 CFR Part 63 Subpart A General Provisions and Subpart WWWW National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations			

Note: The permittee has elected to comply with the work practice standards using either a control device (§63.11507(a)(2)) or a tank cover (§63.11507(a)(3)).

Work Practice Standards:

- 1) The permittee must achieve compliance with the applicable provisions of subpart WWWW no later than July 1, 2010. [§63.11506 (a)]
- 2) The permittee must comply with the requirements of the General Provisions (40 CFR Part 63, subpart A) according to Table 1 of subpart WWWW. [§63.11510]
- 3) The permittee must comply with the requirements in §63.11507(a)(2), or (3), and implement the applicable management practices in §63.11507(g), as practicable. [§63.11507(a)]
 - a) You must capture and exhaust emissions from the affected tank to any one of the following emission control devices: composite mesh pad, packed bed scrubber, or mesh pad mist eliminator, according to §63.11507(a)(2)(i) and (ii). [§63.11507(a)(2)]
 - i) You must operate all capture and control devices according to the manufacturer's specifications and operating instructions. [§63.11507(a)(2)(i)]
 - ii) You must keep the manufacturer's specifications and operating instructions at the facility at all times in a location where they can be easily accessed by the operators. [§63.11507(a)(2)(ii)] or,
 - b) You must cover the tank surface according to §63.11507(a)(3)(i). [§63.11507(a)(3)]
 - i) For batch electrolytic process tanks you must use a tank cover, as defined in §63.11511, over all of the effective surface area of the tank for at least 95 percent of the electrolytic process operating time. [§63.11507(a)(3)(i)]
- 4) *Management Practices:* The permittee must implement the applicable management practices in §63.11507(g)(1) through (12), as practicable. [§63.11507(g)]
 - a) Minimize bath agitation when removing any parts processed in the tank, as practicable except when necessary to meet part quality requirements. [§63.11507(g)(1)]
 - b) Maximize the draining of bath solution back into the tank, as practicable, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable. [§63.11507(g)(2)]
 - c) Optimize the design of barrels, racks, and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank), as practicable. [§63.11507(g)(3)]

- d) Use tank covers, if already owned and available at the facility, whenever practicable. [§63.11507(g)(4)]
- e) Minimize or reduce heating of process tanks, as practicable (e.g., when doing so would not interrupt production or adversely affect part quality). [§63.11507(g)(5)]
- f) Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected sources, as practicable. [§63.11507(g)(6)]
- g) Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pre-treated parts to be plated, as practicable. [§63.11507(g)(7)]
- h) Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks, as practicable. [§63.11507(g)(8)]
- i) Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns, as practicable. [§63.11507(g)(9)]
- j) Minimize spills and overflow of tanks, as practicable. [§63.11507(g)(10)]
- k) Use squeegee rolls in continuous or reel-to-reel plating tanks, as practicable. [§63.11507(g)(11)]
- l) Perform regular inspections to identify leaks and other opportunities for pollution prevention. [§63.11507(g)(12)]

Monitoring:

- 1) The permittee must be in compliance with the applicable management practices and equipment standards in subpart WWWWWW at all times. [§63.11508(b)]
- 2) *Initial Compliance:* To demonstrate initial compliance, the permittee satisfy the requirements specified in §63.11508(c)(2) or (3). [§63.11508(c)]
 - a) If you use a control system, as defined in §63.11511, to comply with subpart WWWWWW, you must demonstrate initial compliance according to §63.11508(c)(2)(i) through (v). [§63.11508(c)(2)]
 - i) You must install a control system designed to capture emissions from the affected tank and exhaust them to a composite mesh pad, packed bed scrubber, or mesh pad mist eliminator. [§63.11508(c)(2)(i)]
 - ii) You must state in your Notification of Compliance Status that you have installed the control system according to the manufacturer's specifications and instructions. [§63.11508(c)(2)(ii)]
 - iii) You must implement the applicable management practices specified in §63.11507(g), as practicable. [§63.11508(c)(2)(iii)]
 - iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), as practicable. [§63.11508(c)(2)(iv)]
 - v) You must follow the manufacturer's specifications and operating instructions for the control systems at all times. [§63.11508(c)(2)(v)]
 - b) If you use a tank cover, as defined in §63.11511, to comply with subpart WWWWWW, you must demonstrate initial compliance according to §63.11508(c)(3)(i) through (iv). [§63.11508(c)(3)]
 - i) You must install a tank cover on the affected tank. [§63.11508(c)(3)(i)]
 - ii) You must state in your Notification of Compliance Status that you operate the tank with the cover in place at least 95 percent of the electrolytic process operating time. [§63.11508(c)(3)(ii)]
 - iii) You must implement the applicable management practices specified in §63.11507(g), as practicable. [§63.11508(c)(3)(iii)]

- iv) You must state in your Notification of Compliance Status that you have implemented the applicable management practices specified in §63.11507(g), as practicable. [§63.11508(c)(3)(iv)]
- 3) *Continuous Compliance*: To demonstrate continuous compliance with the applicable management practices and equipment standards specified in subpart WWWW, you must satisfy the requirements specified in §63.11508(d)(1), (2), (4), (6) and (8). [§63.11508(d)]
 - a) You must always operate and maintain your affected source, including air pollution control equipment. [§63.11508(d)(1)]
 - b) You must prepare an annual compliance certification according to the requirements specified in §63.11509(c), “Notification, Reporting, and Recordkeeping,” and keep it in a readily-accessible location for inspector review. [§63.11508(d)(2)]
 - c) If you use a control system to comply with subpart WWWW, you must demonstrate continuous compliance according to §63.11508(d)(4)(i) through (v). [§63.11508(d)(4)]
 - i) You must operate and maintain the control system according to the manufacturer's specifications and instructions. [§63.11508(d)(4)(i)]
 - ii) Following any malfunction or failure of the capture or control devices to operate properly, you must take immediate corrective action to return the equipment to normal operation according to the manufacturer's specifications and operating instructions. [§63.11508(d)(4)(ii)]
 - iii) You must state in your annual certification that you have operated and maintained the control system according to the manufacturer's specifications and instructions. [§63.11508(d)(4)(iii)]
 - iv) You must record the results of all control system inspections, deviations from proper operation, and any corrective action taken. [§63.11508(d)(4)(iv)]
 - v) You must keep the manufacturer's operating instructions at the facility at all times in a location where they can be easily accessed by the operators. [§63.11508(d)(4)(v)]
 - d) If you comply by operating the affected tank with a cover, you must demonstrate continuous compliance according to §63.11508(d)(6)(i) through (iii). [§63.11508(d)(6)]
 - i) You must operate the tank with the cover in place at least 95 percent of the electrolytic process operating time. [§63.11508(d)(6)(i)]
 - ii) You must record the times that the tank is operated and the times that the tank is covered on a daily basis. [§63.11508(d)(6)(ii)]
 - iii) You must state in your annual certification that you have operated the tank with the cover in place at least 95 percent of the electrolytic process time. [§63.11508(d)(6)(iii)]
 - e) The permittee must demonstrate continuous compliance according to §63.11508(d)(8)(i) and (ii). [§63.11508(d)(8)]
 - i) You must implement the applicable management practices during all times that the affected tank or process is in operation. [§63.11508(d)(8)(i)]
 - ii) You must state in your annual compliance certification that you have implemented the applicable management practices, as practicable. [§63.11508(d)(8)(ii)]

Recordkeeping:

- 1) You must keep the records specified in §63.11509(e)(1) through (3). [§63.11509(e)]
 - a) A copy of any Initial Notification and Notification of Compliance Status that you submitted and all documentation supporting those notifications. [§63.11509(e)(1)]
 - b) The records specified in §63.10(b)(2)(i) through (iii) and (xiv) of the General Provisions of part 63. [§63.11509(e)(2)]

- c) The records required to show continuous compliance with each management practice and equipment standard that applies to you, as specified in §63.11508(d), “What are my compliance requirements?” [§63.11509(e)(3)]
- 2) You must keep each record for a minimum of 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. You must keep each record onsite for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1) of the General Provisions to part 63. You may keep the records offsite for the remaining 3 years. [§63.11509(f)]
- 3) These records shall be made available immediately for inspection to the Department of Natural Resources' personnel upon their verbal request and presentation of identification.

Reporting:

- 1) *Notification of Compliance:* The permittee must submit a Notification of Compliance Status in accordance with §63.11509(b)(1) and (2). [§63.11509(b)]
 - a) The Notification of Compliance Status must be submitted before the close of business on July 1, 2010. [§63.11509(b)(1)]
 - b) The Notification of Compliance Status must include the items specified in §63.11509(b)(2)(i) through (iv). [§63.11509(b)(2)]
 - i) List of affected sources and the plating and polishing metal HAP used in, or emitted by, those sources. [§63.11509(b)(2)(i)]
 - ii) Methods used to comply with the applicable management practices and equipment standards. [§63.11509(b)(2)(ii)]
 - iii) Description of the capture and emission control systems used to comply with the applicable equipment standards. [§63.11509(b)(2)(iii)]
 - iv) Statement by the owner or operator of the affected source as to whether the source is in compliance with the applicable standards or other requirements. [§63.11509(b)(2)(iv)]
- 2) *Annual Certification of Compliance:* The permittee must prepare an annual certification of compliance report according to §63.11509(c)(2), (4), (6) and (7). These reports do not need to be submitted unless a deviation from the requirements of subpart WWWW has occurred during the reporting year, in which case, the annual compliance report must be submitted along with the deviation report. [§63.11509(c)]
 - a) If you use a control device to you comply with §63.11507(a), you must state in your annual certification that you have operated and maintained the control system according to the manufacturer's specifications and instructions. [§63.11509(c)(2)]
 - b) If you comply with §63.11507(a) by operating the affected tank with a cover, you must state in your annual certification that you have operated the tank with the cover in place at least 95 percent of the electrolytic process time. [§63.11509(c)(4)]
 - c) The permittee must state in your annual compliance certification that you have implemented the applicable management practices, as practicable. [§63.11509(c)(6)]
 - d) Each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report, and postmarked or delivered no later than January 31 of the year immediately following the reporting period. [§63.11509(c)(7)]

If any deviations from the compliance requirements specified in subpart WWWW occurred during the year, you must report the deviations, along with the corrective action taken, and submit this report to the Air Pollution Control Program. [§63.11509(d)]

IV. Core Permit Requirements

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

10 CSR 10-6.045 Open Burning Requirements

- (1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- (2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
 - (A) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
 1. Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
 2. Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
 3. St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
 4. St. Louis metropolitan area. The open burning of household refuse is prohibited;
 - (B) Yard waste, with the following exceptions:
 1. Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
 2. Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
 3. St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
 - A. A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
 - B. A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
 - C. The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
 - D. In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the Department Director; and

4. St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- (3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- (4) Nordenia U.S.A., Inc. may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Nordenia U.S.A., Inc. fails to comply with the provisions or any condition of the open burning permit.
 - (A) In a nonattainment area, as defined in 10 CSR 10-6.020, paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- (5) Reporting and Record Keeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- (6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions
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- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;

- i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
 - 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
 - 4) Nothing in this rule shall be construed to limit the authority of the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
 - 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources' personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

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

- 1) The permittee shall complete and submit an Emission Inventory Questionnaire (EIQ) annually.
- 2) The permittee may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.

- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079 to satisfy the requirements of the Federal Clean Air Act, Title V.
- 5) The permittee shall complete required reports on state supplied EIQ forms or in a form satisfactory to the Director and the reports shall be submitted to the Director by June 1 after the end of each reporting period.
- 6) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 7) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170

Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

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

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 the visible emissions were normal for the installation.
- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) 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 10-3.090 Restriction of Emission of Odors

This requirement is not federally enforceable.

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

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

Emission Limitation:

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

Monitoring:

- 1) The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
- 2) The permittee must maintain the following monitoring schedule:
 - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after permit issuance.
 - b) Should the permittee observe no violations of this regulation during this period then-
 - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
 - ii) If a violation is noted, monitoring reverts to weekly.
 - iii) Should no violation of this regulation be observed during this period then-
 - (1) The permittee may observe once per month.
 - (2) If a violation is noted, monitoring reverts to weekly.
- 3) If the source reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner from the initial monitoring frequency.

Recordkeeping:

The permittee shall maintain records of all observation results using Attachment B (or its equivalent), noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;
- 3) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.

- d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the Director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and

- c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

None.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

This permit may be reopened for cause if:

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

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

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

VI. Attachments

Attachments follow.

Attachment A (continued)

VOC Emission Tracking for Nordenia U.S.A., Inc. Jackson, Missouri

	Jan.	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Brown Film Extrusion ²												
From Extrusion (lbs)												
AST Vents ³												
From N-Propyl Acetate Throughput ATM-1 (gal)												
From Solvent Blend-MW 235 Throughput ATM-2 (gal)												
From Ethyl Acetate Throughput ATM-32 (gal)												
From Diesel Storage Tank ATM-D1 & D2 (gal)												
Ink Blending and Storage ³												
From Blending (ATM-5) and Storage (ATM 33) (lbs)												
Diesel Water Pumps												
From Diesel Usage (lbs)												
Propane Usage (Boilers & Misc)												
From Propane Usage (lbs)												
TOTAL UNCONTROLLED VOC (lbs)												
TOTAL UNCONTROLLED VOC (tons)												
VOC EMISSIONS FROM ROTO PRESSES AND LAMINATOR												
Roto Presses (2201, 2202, 2203, 2204, 2205)												
Pounds of ink used times mass fraction of VOC (lbs)												
Laminator 2253												
Pounds of solvent-based adhesive used times mass fraction of VOC (lbs)												
Total VOC Emissions to Incinerator and Workroom Air (lbs)												
Overall Capture and Control Efficiency ⁷												
VOC EMISSIONS (RTO Stacks and Fugitives) (lbs)												
VOC EMISSIONS (RTO Stacks and Fugitives) (tons)												
FACILITY TOTALS												
TOTAL MONTHLY VOC EMISSIONS (tons)												
12-MONTH ROLLING TOTAL VOC EMISSIONS (tons)												

¹ VOC content based on most recent information from sampling

²Emission factor based on information from the Society of Plastics Industry

³Calculated using TANKS 4.09d

⁴Calculated using AP-42 emission factor. Each pump is 0.6 MMBtu/hr.

⁵Average VOC content provided by ink vendor and/or listed on Material Safety Data Sheets

⁶Adhesive solvent content based on Material Safety Data Sheets

⁷ Use capture and control efficiencies approved by Peter Yronwode (see memorandum to MDNR Source File No. 031-0072 regarding *Nordenia USA RTO Test Report*, September 28, 2009). As of September 2009, destruction efficiency for Adwest 25 RTO (CD-05) is 99.21% and the destruction efficiency for Adwest 55 RTO (CD-06) is 99.15%. Capture efficiency is 99.2 %.

Attachment B

Compliance Assurance Monitoring (CAM) Plan for Adwest 25 RTO (CD-05) for VOC Control
Roto Gravure Printing Presses and Laminator 2253
Nordenia U.S.A., Inc., Jackson, Missouri

BACKGROUND

I. EMISSIONS UNIT¹

Description: Rotogravure Printing Presses 2201, 2202, 2203, 2204, 2205 and Laminator 2253
Identification: ATM 4-1, ATM 4-2, ATM 4-3, ATM 28, ATM 29 and ATM 31 (EU0010 through EU0060)
Facility: Nordenia U.S.A., Inc.
Jackson, Missouri

II. APPLICABLE REGULATIONS, EMISSION LIMITS, AND MONITORING REQUIREMENTS

Regulation: 10 CSR 10-6.060 (Permit No. 052008-002)
Emission/Operating Limits: Roto press must be vented to regenerative thermal oxidizer (RTO) at all times when operating; Laminator 2253 must be vented to RTO at all times when using solvent-based adhesives or ink.

RTO must operate at a minimum temperature of 1500 °F

VOC emissions less than 250 tons/year from existing equipment

Monitoring Requirements: Combustion chamber temperature and alternating current frequency delivered to fan motors

III. CONTROL TECHNOLOGY

Adwest 25 RTO

The key elements of the monitoring approach are presented in Table 1-1.

¹ The five printing presses each have the capability to vent to two RTOs. The control devices are not identical, therefore each of the two RTO CAM Plans show all five units.

Attachment B (continued)

TABLE 1-1. POINT SOURCE EMISSION UNITS AT NORDENIA

Requirement	Parameter
I. Indicator Measurement Approach	Combustion chamber temperature when chamber temperature is below indicator range. The combustion chamber temperature is measured continuously using a thermocouple in the combustion chamber.
II. Indicator Range	The manufacturer recommends a combustion chamber temperature of 1500 °F. The process control system operates such that, on startup, the printing presses cannot begin operating until the RTO combustion chamber temperature has been greater than or equal to 1500 °F for at least 10 minutes. The printing presses will automatically shut down if the RTO combustion chamber temperature falls below 1500 °F.
III. Performance Criteria	
A. Data Representativeness	The monitoring system consists of a thermocouple in the combustion chamber with a digital readout and electronic data storage. The digital readout provides continuous combustion chamber temperature readings and the data is electronically recorded at least every 15 minutes.
B. Verification of Operational Status	The equipment has been installed and calibrated according to the manufacturer's specifications.
C. QA/QC Practices and Criteria	The thermocouple will be changed every 18 months and calibrated according to the manufacturer's specifications. This thermocouple change-out schedule is more frequent than the manufacturer's recommendation of every 3-5 years.
D. Monitoring Frequency and Data Collection Procedures	The temperature of the combustion chamber is continuously displayed and recorded.

Attachment B (continued)

JUSTIFICATION

I. BACKGROUND

There are five rotogravure printing presses at the Nordenia facility. The roto presses apply ink to polyethylene film during the production of flexible packaging at the facility. The emissions from the five roto presses are controlled by two regenerative thermal oxidizers. The roto press control device system is configured such that the emissions can be routed to one or both of the control devices at any given time.

II. RATIONALE FOR SELECTION OF PERFORMANCE INDICATOR

The combustion chamber temperature is the parameter that is most indicative of control device performance. If the combustion zone temperature decreases, complete optimum combustion may not occur resulting in an increase in VOC emissions. By maintaining the operating temperature above the minimum level, applicable control efficiencies can be achieved.

Selection of this performance indicator is consistent with the special conditions in the construction Permit No. 052008-002 issued to Nordenia on May 27, 2008.

III. RATIONALE FOR SELECTION OF INDICATOR RANGES

The manufacturer recommends a combustion chamber temperature of 1500 °F. The process control system operates, such that, on startup the printing presses cannot begin operating until the RTO combustion chamber temperature has been greater than or equal to 1500 °F for at least 10 minutes. The printing presses will automatically shut down if the RTO combustion chamber temperature falls below 1500 °F. The combustion chamber temperature was verified during a performance test conducted on June 4, 2009.

IV. IMPLEMENTATION PLAN

Stack testing was conducted on the Adwest 25 regenerative thermal oxidizer on June 4, 2009. The MDNR approved the results of the performance test in a letter to Nordenia dated September 29, 2009. No further testing is necessary to establish the CAM Plan indicator range. The facility will comply with the CAM requirement upon issuance of the Title V permit renewal.

Attachment C

Compliance Assurance Monitoring (CAM) Plan for Adwest 55 RTO (CD-06) for VOC Control
Roto Gravure Printing Presses and Laminator 2253
Nordenia U.S.A., Inc., Jackson, Missouri

BACKGROUND

I. EMISSIONS UNIT²

Description: Rotogravure Printing Presses 2201, 2202, 2203, 2204, 2205 and Laminator 2253

Identification: ATM 4-1, ATM 4-2, ATM 4-3, ATM 28, ATM 29 and ATM 31 (EU0010 through EU0060)

Facility: Nordenia U.S.A., Inc.
Jackson, Missouri

II. APPLICABLE REGULATIONS, EMISSION LIMIT, AND MONITORING REQUIREMENTS

Regulation: 10 CSR 10-6.060 (Permit No. 052008-002)

Emission Limits: Roto press must be vented to regenerative thermal oxidizer (RTO) at all times when operating; Laminator 2253 must be vented to RTO at all times when using solvent-based adhesives or ink.

RTO must operate at a minimum temperature of 1500 °F

VOC emissions less than 250 tons/year from existing equipment

Monitoring Requirements: Combustion chamber temperature and alternating current frequency delivered to fan motors

III. CONTROL TECHNOLOGY

Adwest 55 RTO

The key elements of the monitoring approach are presented in Table 1-1.

² The five printing presses each have the capability to vent to two RTOs. The control devices are not identical, therefore each of the two RTO CAM Plans show all five units.

Attachment C (continued)

TABLE 1-1. POINT SOURCE EMISSION UNITS AT NORDENIA

Requirement	Parameter
I. Indicator Measurement Approach	Combustion chamber temperature when chamber temperature is below indicator range. The combustion chamber temperature is measured continuously using a thermocouple in the combustion chamber.
II. Indicator Range	The manufacturer recommends a combustion chamber temperature of 1500 °F. The process control system operates such that, on startup, the printing presses cannot begin operating until the RTO combustion chamber temperature has been greater than or equal to 1500 °F for at least 10 minutes. The printing presses will automatically shut down if the RTO combustion chamber temperature falls below 1500 °F.
III. Performance Criteria	
A. Data Representativeness	The monitoring system consists of a thermocouple in the combustion chamber with a digital readout and electronic data storage. The digital readout provides continuous combustion chamber temperature readings and the data is electronically recorded at least every 15 minutes.
B. Verification of Operational Status	The equipment has been installed and calibrated according to the manufacturer's specifications.
C. QA/QC Practices and Criteria	The thermocouple will be changed every 18 months and calibrated according to the manufacturer's specifications.
D. Monitoring Frequency and Data Collection Procedures	The temperature of the combustion chamber is continuously displayed and recorded.

Attachment C (continued)

JUSTIFICATION

I. BACKGROUND

There are five rotogravure printing presses at the Nordenia facility. The roto presses apply ink to polyethylene film during the production of flexible packaging at the facility. The emissions from the five roto presses are controlled by two regenerative thermal oxidizers. The roto press control device system is configured such that the emissions can be routed to one or both of the control devices at any given time.

II. RATIONALE FOR SELECTION OF PERFORMANCE INDICATOR

The combustion chamber temperature is the parameter that is most indicative of control device performance. If the combustion zone temperature decreases, complete optimum combustion may not occur resulting in an increase in VOC emissions. By maintaining the operating temperature above the minimum level, applicable control efficiencies can be achieved.

The monitoring technique is consistent with the special conditions in the construction Permit No. 052008-002 issued to Nordenia on May 27, 2008.

III. RATIONALE FOR SELECTION OF INDICATOR RANGES

The manufacturer recommends a combustion chamber temperature of 1500 °F. The process control system operates, such that, on startup the printing presses cannot begin operating until the RTO combustion chamber temperature has been greater than or equal to 1500 °F for at least 10 minutes. The printing presses will automatically shut down if the RTO combustion chamber temperature falls below 1500 °F. The combustion chamber temperature was verified during a performance test conducted on June 3, 2009.

IV. IMPLEMENTATION PLAN

Stack testing was conducted on the Adwest 55 regenerative thermal oxidizer on June 3, 2009. The MDNR approved the results of the performance test in a letter to Nordenia dated September 29, 2009. No further testing is necessary to establish the CAM Plan indicator range. The facility will comply with the CAM requirement upon issuance of the Title V permit renewal.

STATEMENT OF BASIS

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Part 70 Operating Permit Application, received January 30, 2006;
- 2) 2008 Emissions Inventory Questionnaire, received April 10, 2009;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition; and
- 4) Memorandum from Peter Yronwode, to MDNR Source File No. 031-0072 regarding *Nordenia USA RTO Test Report*, September 28, 2009, MDNR.

Historical Notes

- 1) The following table explains the differences in this renewal-operating permit as compared to the previous operating permit OP No. 2001-072.

EU # Renewal Operating Permit	EU # Operating Permit No. 2001-072	Description of Emission Unit	Description of Change
EU0010	EU0010	Rotogravure Press 2201	All special conditions found in construction permits previously issued by APCP and listed in OP 2001-072 have been superseded by Construction Permit 052008-002
EU0020	EU0020	Rotogravure Press 2202	
EU0030	EU0030	Rotogravure Press 2203	
EU0040	EU0040	Rotogravure Press 2204	
EU0050	NA	Rotogravure Press 2205	New emission unit; installed 2008
EU0060	NA	Laminator 2253	New emission unit; installed 2006
EU0070	EU0050	Chrome Electroplating	Renumbered; control device used was incorrect in OP 2001-072, Permit Condition EU0070-001 rewritten for correct control device.
EU0080	NA	Nickel Electroplating	Subject to new rule 10 CSR 10-6.075, 40 CFR Part 63 Subpart WWWW; therefore, this unit is now listed as an Emission Unit With Limitations
NA	EU0060	Dechrome Electroplating	Dechrome process is not subject to 10 CSR 10-6.075, 40 CFR Part 63 Subpart N or any unit-specific emission limitation; therefore, this unit is now listed as an Emission Unit Without Limitations
NA	EU0070	Corona Treater Ozone Exhaust	Unit was not required to obtain construction permit and is not subject to any unit-specific emission limitation; therefore, this unit is now listed as an Emission Unit Without Limitations

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

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

10 CSR 10-6.075 *Maximum Achievable Control Technology Regulations*

40 CFR Part 63 Subpart WWWW, *National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations*

- 1) This rule was not promulgated at the time of the issuance of the previous operating permit or the submittal of the operating permit application. Nickel Electroplating (EU0080) is subject to this subpart. The permittee must achieve compliance with the applicable provisions of subpart WWWW no later than July 1, 2010.

Other Air Regulations Determined Not to Apply to the Operating Permit

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

10 CSR 10-6.100, *Alternate Emission Limits*

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

Construction Permit Revisions

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

- 1) MDNR Construction Permit No. 1289-003, issued December 14, 1989
- 2) MDNR Construction Permit No. 0690-015A, issued June 29, 1990
- 3) MDNR Construction Permit No. 1293-014, issued November 29, 1993
- 4) MDNR Construction Permit No. 0794-013, issued July 19, 1994
- 5) MDNR Construction Permit No. 0795-010, issued July 5, 1995
- 6) MDNR Construction Permit No. 102000-026, issued October 13, 2000
- 7) MDNR Construction Permit No. 042006-005, issued April 12, 2006
- 8) MDNR Construction Permit No. 042006-005A, issued November 22, 2006
 - a) The special conditions in each of the above construction permits have been superseded by the special conditions of Construction Permit No. 052008-002 and therefore are not included in the operating permit.
- 9) MDNR Construction Permit No. 052008-002
 - a) Special Condition No. 4.B establishes performance testing requirements for the regenerative thermal oxidizers to determine VOC destruction efficiency. The initial performance testing was completed by the facility and the results have been reviewed and approved by Air Pollution Control Program. Results are given in Peter Yronwode's memorandum to MDNR Source File No. 031-0072 dated September 29, 2009. VOC destruction efficiency testing for both of the thermal oxidizers must be repeated in five years.
 - b) Special Condition No. 5 relates to the adjustment of capture and control efficiency for the regenerative thermal oxidizers. The Air Pollution Control Program has reviewed and approved the results of the initial performance testing (required by Special Conditions 4.A. through 4.D) and the adjusted control efficiencies have been included in Permit Condition (EU0010 through EU0060)-001.

New Source Performance Standards (NSPS) Applicability

- 1) 40 CFR Part 60 Subpart QQ, *Standards of Performance for the Graphics Arts Industry: Publication Rotogravure Printing*
 - a) This rule does not apply to the rotogravure printing presses (EU0010 through EU0050) because the presses do not meet the definition for “publication rotogravure printing press” as defined in 40 CFR §60.431.
- 2) 40 CFR Part 60 Subpart Kb, *Standard of Performance for Volatile Organic Liquid Storage Vessels*
 - a) This rule applies to storage vessels with a capacity greater than 40 cubic meters (m³) that are used to store volatile organic liquids. There are no storage vessels at Nordenia U.S.A., Inc. that meet this definition.

None of the other NSPS standards applies.

Maximum Available Control Technology (MACT) Applicability

- 1) 40 CFR Part 63 Subpart N, *National Emission Standards for Hard and Decorative Chromium Electroplating and Chromium Anodizing Tanks*
 - a) Chrome Electroplating (EU0070) is subject to this rule. Those sections of subpart N that apply to existing hard chromium electroplating tanks located at a small, hard chromium electroplating facility utilizing a fiber-bed mist eliminator are incorporated into Permit Condition EU0070-001.
- 2) 40 CFR Part 63 Subpart T, *National Emission Standards for Halogenated Solvent Cleaning*
 - a) This rule is not applied because the facility does not use methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform in its degreasing operations.
- 3) 40 CFR Part 63 Subpart WWWW, *National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations*
 - a) Chrome Electroplating (EU0070) is not subject to this rule because according paragraph 63.11505(3)(d)(1), this rule does not apply to process units that are subject to the requirements of 40 CFR Part 63, subpart N.
 - b) Nickel Electroplating (EU0080) is subject to this rule and must achieve compliance with the applicable provisions no later than July 1, 2010. Those sections of subpart WWWW that apply to existing nickel electroplating tanks that utilize either a control device or a tank cover to comply with the work practice standards are incorporated into Permit Condition EU0080-001.
 - c) Cooper Electroplating (ATM 19) is not subject to this rule because copper is not a plating and polishing metal HAP as defined by §63.11511. Plating and polishing metal HAP include the following metals: cadmium, chromium, lead, manganese, and nickel.
 - d) Initial Notification required by §63.11509 was received by the Air Pollution Control Program on November 3, 2008. Therefore, sections of this rule regarding initial notification are not included.
- 4) 40 CFR Part 63 Subpart KK, *National Emission Standards for the Printing and Publishing Industry*
 - a) This rule only applies to facilities that are major sources of hazardous air pollutants (HAPs). Nordenia U.S.A., Inc. is not a major source of HAPs, therefore, the rule is not applicable.

None of the other MACT standards applies.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

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

None of the other NESHAP standards applies.

Compliance Assurance Monitoring (CAM) Applicability

40 CFR Part 64, *Compliance Assurance Monitoring (CAM)*

The CAM rule applies to each pollutant specific emission unit that:

- Is subject to an emission limitation or standard, and
- Uses a control device to achieve compliance, and
- Has pre-control emissions that exceed or are equivalent to the major source threshold.

40 CFR Part 64 was determined to be applicable to the Rotogravure Presses (EU0010 through EU0050) and Laminator (EU0060) because these emission units use control devices (Adwest 25 RTO CD-05 and Adwest 55 RTO CD-06) to achieve compliance with the Volatile Organic Compound (VOC) limit established in Construction Permit No. 052008-002 by the authority of 10 CSR 10-6.060. Permit Condition (EU0010 through EU0060)-001 contains the Compliance Assurance Monitoring Approach for the RTOs and Attachments B and C contain the Compliance Assurance Monitoring Plans.

Other Regulatory Determinations

1) 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*

- a) This rule is not applied the Rotogravure Presses (EU0010 through EU0050), Laminator (EU0060), Cylinder Preparation – Degreasing, or PRI Parts Washing System (ATM 27) because opacity exceedances would not be expected as Volatile Organic Compound (VOC) vapors are the only significant air pollutant emissions.
- b) This rule is not applied to the Storage Tanks (ATM 1, 2, 33 and 34) or Ink Mixing and Storage (ATM 5) because opacity exceedances would not be expected as VOC vapors are the only air pollutant emissions.
- c) This rule is not applied to Chrome Electroplating (EU0070), Nickel Electroplating (EU0080), Copper Electroplating (ATM 19), Dechrome (ATM 21), Polyethylene Pellet Silos (ATM 24), Blown Film Extrusion Line (ATM 25), or the Bag Machines (ATM 26) because opacity exceedances would not be expected, as these units are inherently compliant because of low potential emissions.
- d) This rule was not applied to the Hot Water Heaters (ATM 6, 7, and 34) or the Regenerative Thermal Oxidizers (CD-05 and CD-06) because no opacity exceedances would be expected from these propane-fired units.

2) 10 CSR 10-3.060, *Maximum Allowable Emissions of Particulate Matter from Fuel Burning Equipment Used for Indirect Heating*

- a) This rule is not applied the Hot Water Heaters (ATM 6, 7, and 34) because it is highly unlikely that the minimal PM emissions from these propane-fired units would ever exceed the particulate matter emission limitation.

- 3) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*
- This rule is not applied to the Hot Water Heaters (ATM 6, 7, and 34) because according to §(1)(A)2, combustion equipment that uses exclusively liquefied petroleum gas as defined by American Society for Testing and Materials (ASTM) is exempt.
- 4) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter from Industrial Processes*
- This rule is not applied to Chrome Electroplating (EU0070), Nickel Electroplating (EU0080), or Copper Electroplating (ATM 19) because PM emissions from plating are minimal.
 - This rule is not applied to the Hot Water Heaters (ATM 6, 7, and 34) because according to §(2)(A), liquids and gases used solely as fuels are excluded in defining process weight.
 - This rule is not applied to the Blown Film Extrusion (ATM 25) because according to §(1)(B)(12), emission units that at a maximum design capacity have a potential to emit less than one-half (0.5) pounds per hour of particulate matter are exempt. The following calculation demonstrates that the Blown Film Extrusion (ATM 25) has the potential to emit less than 0.5 lb/hr.
MHDR: 1837 lb/hr [Source: Construction Permit 052008-002 application]
PM Emission Factor = $(0.39 \times T) - 137$ [Source: *Plastics Technology*, February 1, 1995]
Where: T = process temperature = 446° F
PM Emission Factor = $(0.39 \times 446) - 137 = 36.94 \text{ lb}/10^6 \text{ lbs processed}$
PM PTE = MHDR x Emission Factor
PM PTE = 1837 lb/hr x 36.94 lb/10⁶ lb = 0.07 lb/hr

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:

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

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

Prepared by:

Jason Dickneite
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